

UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD .

In the Matter of )

NRC Docket No. 50-389A

FLORIDA POWER & LIGHT COMPANY )  
(St. Lucie Plant, Unit No. 2

MOTION TO FILE SUBSTITUTE PLEADING

Counsel has noticed a number of typographical errors in Florida Cities' Answer to Joint Motion filed last Thursday. Florida Cities therefore move to file the enclosed substitute copy to replace the previously filed pleading. Counsel regrets and apologizes for any inconvenience that may have been caused.

Respectfully submitted,

Robert A. Jablon  
Attorney for Florida Cities

October 15, 1980

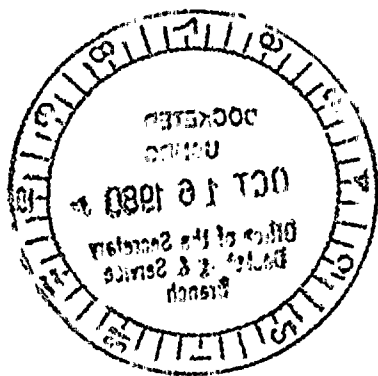
Law offices of:  
Spiegel & McDiarmid  
2600 Virginia Avenue, N.W.  
Washington, D.C. 20037

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ERRATA TO BRIEF ON FLORIDA CITIES' ANSWER TO JOINT MOTION

<u>PAGE NO.</u>	<u>CORRECTION</u>
Page 1, footnote 1, line 5	Correct "It is Florida Cities" to read "It is Florida Cities'"
Page 2, paragraph 3, line 3	Correct "situation and, indeed," to read "situation inconsistent and, indeed,"
Page 4, line 4 paragraph 3, line 3	Correct "on the permitting" to read "or the permitting" Correct "determining procedures" to read "ordering procedures and Correct "understand their concerns" to read "understand their concerns."
paragraph 3, line 4	Correct "in ordering procedures." to read "Florida Cities are"
Page 5, paragraph 1, line 8 line 11 paragraph 1, line 21	Correct "...That" to read ... "...that" Correct "in Florida" <u>1</u> /" to read "in Florida" <u>1</u> /" Correct ", if to settle," to read ", if not to settle,"
Page 8, paragraph 1 line 5	Correct "than FPL, enjoys," to read "than FPL enjoys,"
Page 11, line 3	Correct "power, anticompetitive" to read "power, an anticompetitive"
Page 12, Heading  paragraph 3, last line	Correct "II. PRINCIPLE CONDITIONS" to read "B. PRINCIPAL CONDITIONS"  Correct "with respect" to read "with respect its participation or commitment to participate in St. Lucie Unit No. 2" <u>id</u> , VIIj."
Page 13, paragraph 2 line 9  paragraph 2, last line  footnote 1, line 10	Correct "principle to subjecting them" to read "principle to their being subjected to reasonable"  Added footnote line above footnote  Correct "D.D. Fla. 79.5101.Civ." to read "S.D. Fla. 79-5101 Civ."

<u>PAGE NO.</u>	<u>CORRECTION</u>
Page 14, line 4	Correct "St. Lucie Unit No.2" to read "St. Lucie Unit No. 2,"
line 7	Correct "... "changes in" to read "... changes in"
paragraph 1, line 9	Correct "operate the units" to read "operate the unit" and correct "even cancel them" to read "even cancel it"
paragraph 2, line 1	Correct " <u>Consumer Power</u> " to read " <u>Consumers Power</u> "
line 2	Correct "NRC Docket 50-329A," to read "NRC Docket 50-329A <u>et. al.</u> ,"
line 3	Correct "in this are prepared" to read "in this case are proposed"
Page 15, footnote 3, line 3	Correct "many clear plant" to read "many nuclear plant"
Page 16, line 3	Correct "Lucie Unit No. 2." to read "Lucie Unit No. 2. Condition VIIei."
line 5	Correct "participation, so," to read "participation, so"
line 7	Correct "Florida Cities fears" to read "Florida Cities' fears"
paragraph 1, line 3	Correct ", pp 104-106 A" to read ", pp 104-106. A"
paragraph 1, last line	Correct "personnel public safety. The provisions of the" to read "personnel public safety."
Page 17, footnote 1 line 2	Correct "utility practice; however," to read "utility practice"; however,"
Page 18, line 4.	Correct "for co-woners," to read "for co-owners,"
Page 19, line 6	Correct "foreced withdrawas. <u>1/</u> To tope" to read "forced withdrawals. <u>1/</u> To top"


VERIFICATION

DISTRICT OF COLUMBIA, SS:

Robert A. Jablon, being first duly sworn, deposes and says that he is an attorney for the Utilities Commission of New Smyrna Beach, the Ft. Pierce Utilities Authority of the City of Ft. Pierce, the Lake Worth Utilities Authority, and the Cities of Gainesville, Starke, Homestead, and Tallahassee, Florida and that as such he has signed the foregoing MOTION TO FILE SUBSTITUTE PLEADING AND CORRECTED COPY OF BRIEF ON FLORIDA CITIES' ANSWER TO JOINT MOTION for and on behalf of said parties; that he has read said Motion and is familiar with the contents thereof; and that the matters and things herein set forth are true and correct to the best of his knowledge, information and belief.

  
Robert A. Jablon

Subscribed and sworn  
to before me this 15th  
day of October, 1980

  
Notary Public

My Commission Expires September 30, 1984

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of §1.17 of the Rules and Practice and Procedure.

Dated at Washington, D.C. this 15th day of October, 1980.

  
Robert A. Jablon