

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8101050001 DOC. DATE: 80/12/29 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, S.C. Hearing Branch 2
 RECIPIENT NAME RECIPIENT AFFILIATION
 Atomic Safety and Licensing Board Panel

SUBJECT: Response interposing no objection to motion received 801212
 to permit intervenor & designated experts to enter site.
 Certificate of Svc encl.

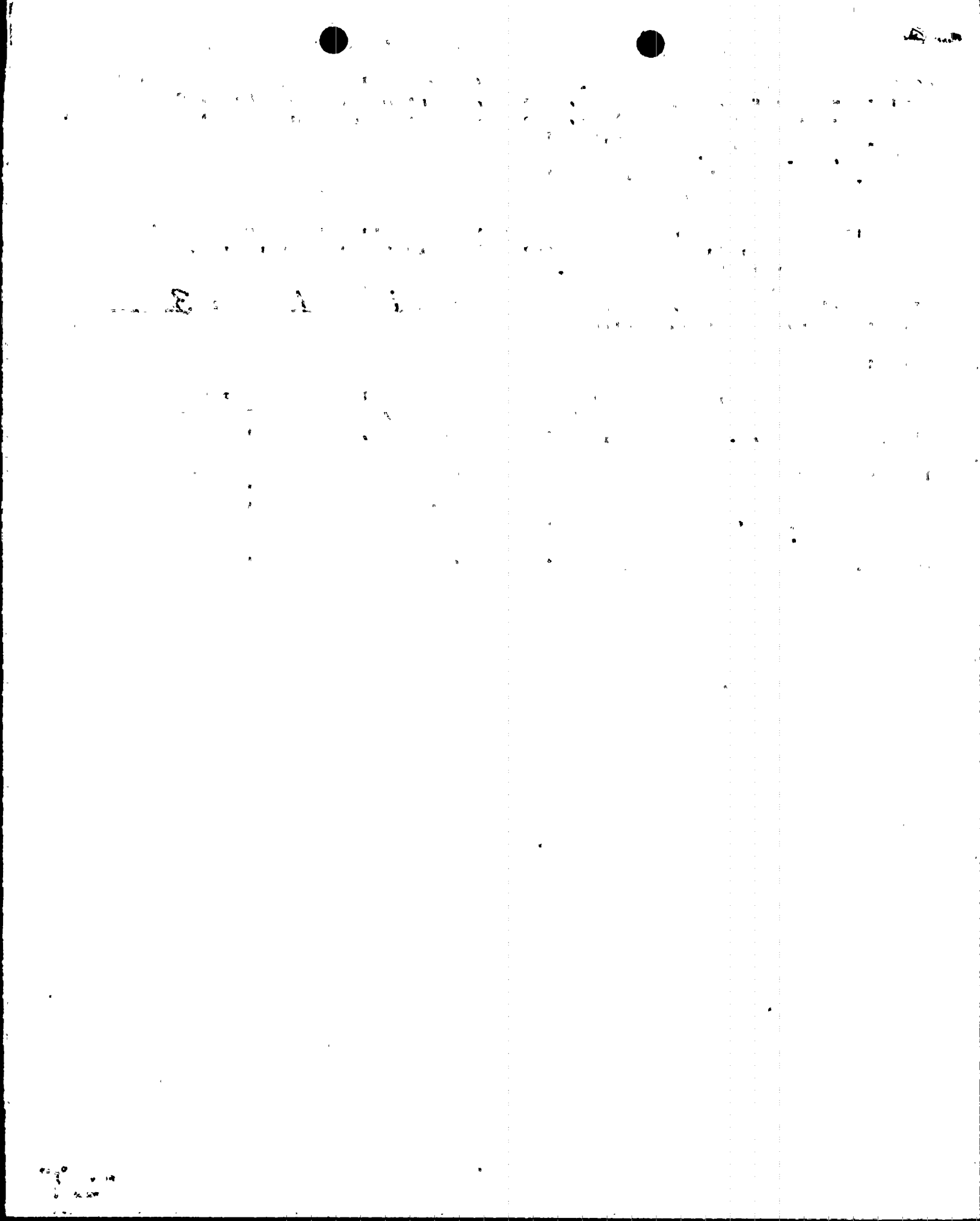
DISTRIBUTION CODE: DS07S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: ELD Filings (Non-Antitrust)

NOTES:

ACTION:	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTR	ENCL		LTR	ENCL
	PARRISH, C.	1	1	GROTENHUIS, M	1	1
INTERNAL:	DSB-H ST	2	2	I&E	2	2
	NRC PDR	1	1	OELD	1	1
	OCC	1	1	PUBLIC AFFAIRS	1	1
	<u>REG FILE</u>	1	1			
EXTERNAL:	LPDR	1	1	NSIC	1	1

JAN 6 1981

SF



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

12/29/80

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
FLORIDA POWER AND LIGHT COMPANY)	Docket Nos. 50-250
(Turkey Point Nuclear Generating)	50-251
Unit Nos. 3 and 4))	(Proposed Amendments to Facility
)	Operating Licenses to Permit
)	Steam Generator Repair)

NRC STAFF RESPONSE TO INTERVENOR'S MOTION
TO PERMIT ENTRY UPON TURKEY POINT SITE

On December 12, 1980, the Staff received a copy of a motion filed by the Intervenor in the captioned proceeding, pursuant to 10 C.F.R. § 2.741, to permit him and any designated experts to enter upon the Turkey Point site to conduct certain specified discovery. Since the Staff is not immediately involved in this matter, it interposes no objection to the motion. Though the present request is of a broader nature, there is licensing board precedent for the requested relief under certain conditions.^{*/}

Respectfully submitted,

Steven C. Goldberg

Steven C. Goldberg
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 29th day of December, 1980.

^{*/} See Consumers Power Co. (Big Rock Point Plant), Licensing Board Order Permitting Entry On-Site (unpublished)(June 23, 1980) (permitted an Intervenor representative onsite to observe a proposed testing of the facility's emergency plan).

DS07
5
1/1

8101050 001

G

200

1
2
3
4
5
6
7
8
9
10

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
FLORIDA POWER AND LIGHT COMPANY)	Docket Nos. 50-250 ..
(Turkey Point Nuclear Generating)	50-251
Unit Nos. 3 and 4))	(Proposed Amendments to Facility
)	Operating Licenses to Permit
)	Steam Generator Repair)

CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF RESPONSE TO INTERVENOR'S MOTION TO PERMIT ENTRY UPON TURKEY POINT SITE in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 29th day of December, 1980.

*Elizabeth S. Bowers, Esq., Chairman
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Emmeth A. Luebke
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Dr. Oscar H. Paris
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Mark P. Oncavage
12200 S. W. 110th Avenue
Miami, Florida 33176

Harold F. Reis, Esq.
Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

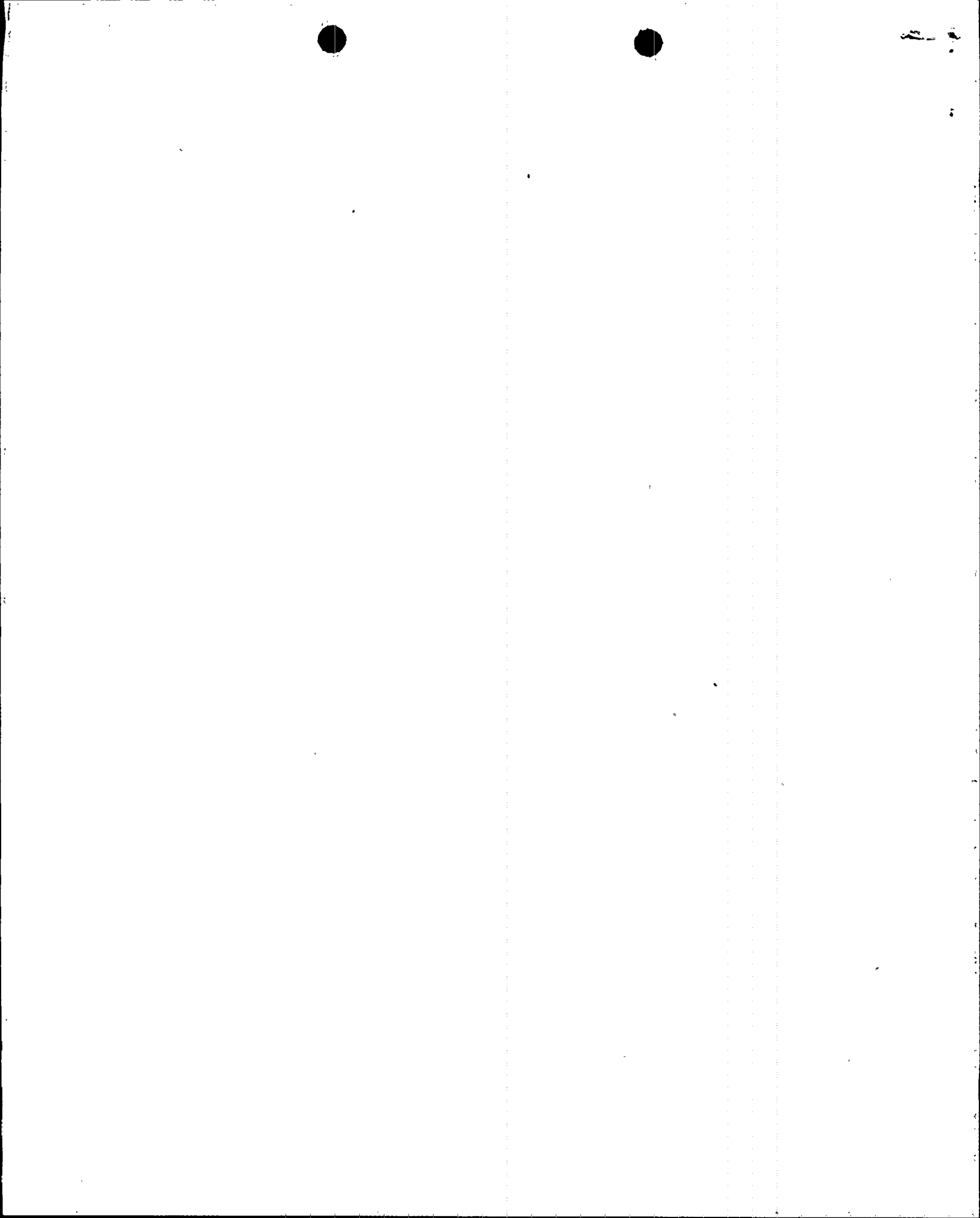
*Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Norman A. Coll, Esq.
Steel, Hector & Davis
Southeast First National
Bank Building
Miami, Florida 33131

Burt Saunders, Esq.
Assistant Dade County Attorney
1626 Dade County Courthouse
Miami, Florida 33130



Neil Chonin, Esq.
New World Tower Building, 30th Floor
100 N. Biscayne Boulevard
Miami, Florida 33132

Henry H. Harnage, Esq.
Peninsula Federal Bldg., 10th Floor
200 S. E. First Street
Miami, Florida 33131



Steven C. Goldberg
Counsel for NRC Staff



Handwritten marks and a small scribble in the top right corner.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

12/29/80

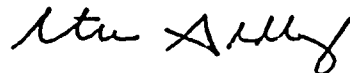
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
FLORIDA POWER AND LIGHT COMPANY)	Docket Nos. 50-250
(Turkey Point Nuclear Generating)	50-251
Unit: Nos. 3 and 4))	(Proposed Amendments to Facility
)	Operating Licenses to Permit
)	Steam Generator Repair)

NRC STAFF RESPONSE TO INTERVENOR'S MOTION
TO PERMIT ENTRY UPON TURKEY POINT SITE

On December 12, 1980, the Staff received a copy of a motion filed by the Intervenor in the captioned proceeding, pursuant to 10 C.F.R. § 2.741, to permit him and any designated experts to enter upon the Turkey Point site to conduct certain specified discovery. Since the Staff is not immediately involved in this matter, it interposes no objection to the motion. Though the present request is of a broader nature, there is licensing board precedent for the requested relief under certain conditions.^{*/}

Respectfully submitted,



Steven C. Goldberg
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 29th day of December, 1980.

^{*/} See Consumers Power Co. (Big Rock Point Plant), Licensing Board Order Permitting Entry On-Site (unpublished)(June 23, 1980) (permitted an Intervenor representative onsite to observe a proposed testing of the facility's emergency plan).



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
FLORIDA POWER AND LIGHT COMPANY)	Docket Nos. 50-250 ..
(Turkey Point Nuclear Generating)	50-251
Unit Nos. 3 and 4))	(Proposed Amendments to Facility
)	Operating Licenses to Permit
)	Steam Generator Repair)

CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF RESPONSE TO INTERVENOR'S MOTION TO PERMIT ENTRY UPON TURKEY POINT SITE in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 29th day of December, 1980.

*Elizabeth S. Bowers, Esq., Chairman
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Emmeth A. Luebke
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Dr. Oscar H. Paris
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Mark P. Oncavage
12200 S. W. 110th Avenue
Miami, Florida 33176

Harold F. Reis, Esq.
Lowenstein, Newman, Reis,
Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

*Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Norman A. Coll, Esq.
Steel, Hector & Davis
Southeast First National
Bank Building
Miami, Florida 33131

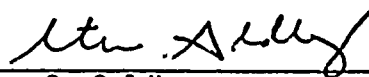
Burt Saunders, Esq.
Assistant Dade County Attorney
1626 Dade County Courthouse
Miami, Florida 33130



Handwritten mark or scribble in the top right corner.

Neil Chonin, Esq.
New World Tower Building, 30th Floor
100 N. Biscayne Boulevard
Miami, Florida 33132

Henry H. Harnage, Esq.
Peninsula Federal Bldg., 10th Floor
200 S. E. First Street
Miami, Florida 33131



Steven C. Goldberg
Counsel for NRC Staff

