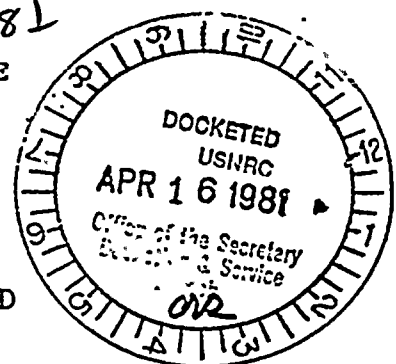
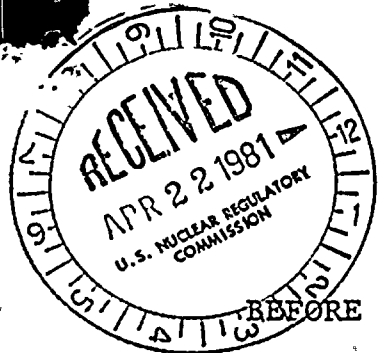


4/14/81

RELATED CORRESPONDENCE



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

INTERVENOR MARK P. ONCAVAGE'S REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM LICENSEE, FLORIDA POWER AND LIGHT COMPANY

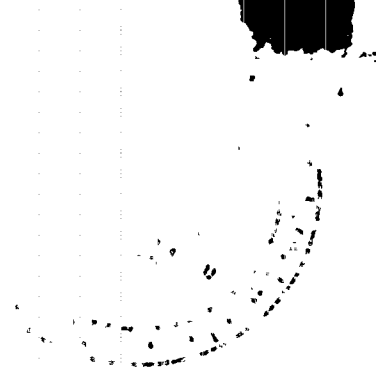
Intervenor, by his undersigned attorney, in accordance with the applicable rules of 10 CFR 2.740 and 2.741, requests the Licensee to produce within thirty (30) days, at the office of the attorney for the Intervenor:

1. All documents in possession, custody, or control of Licensee that outline Licensee's time schedule for the projected repairs on the steam generators. Such schedule would contain the dates of each step of the repairs and list the critical time frame for each task from start to completion.
2. Westinghouse Report # ST Res FJF 30/30, containing material on corrosion product activity which the Licensee used to calculate offsite airborne doses to the public.
3. Document mentioned at Homestead NCR Hearing on September 17, 1980, concerning grit blasting.
4. Document mentioned at Homestead NCR Hearing on September 17, 1980; "Proceedings of American Power Conference 1971, Decontamination of Sena in Brussels," which Licensee used to calculate offsite dose from decontamination processes.
5. The examination results of all personnel who will be involved in the repair and who have obtained unescorted access badges and/or waivers referred to in pages 8 and 9 of the Affidavit of Harvey F. Story.

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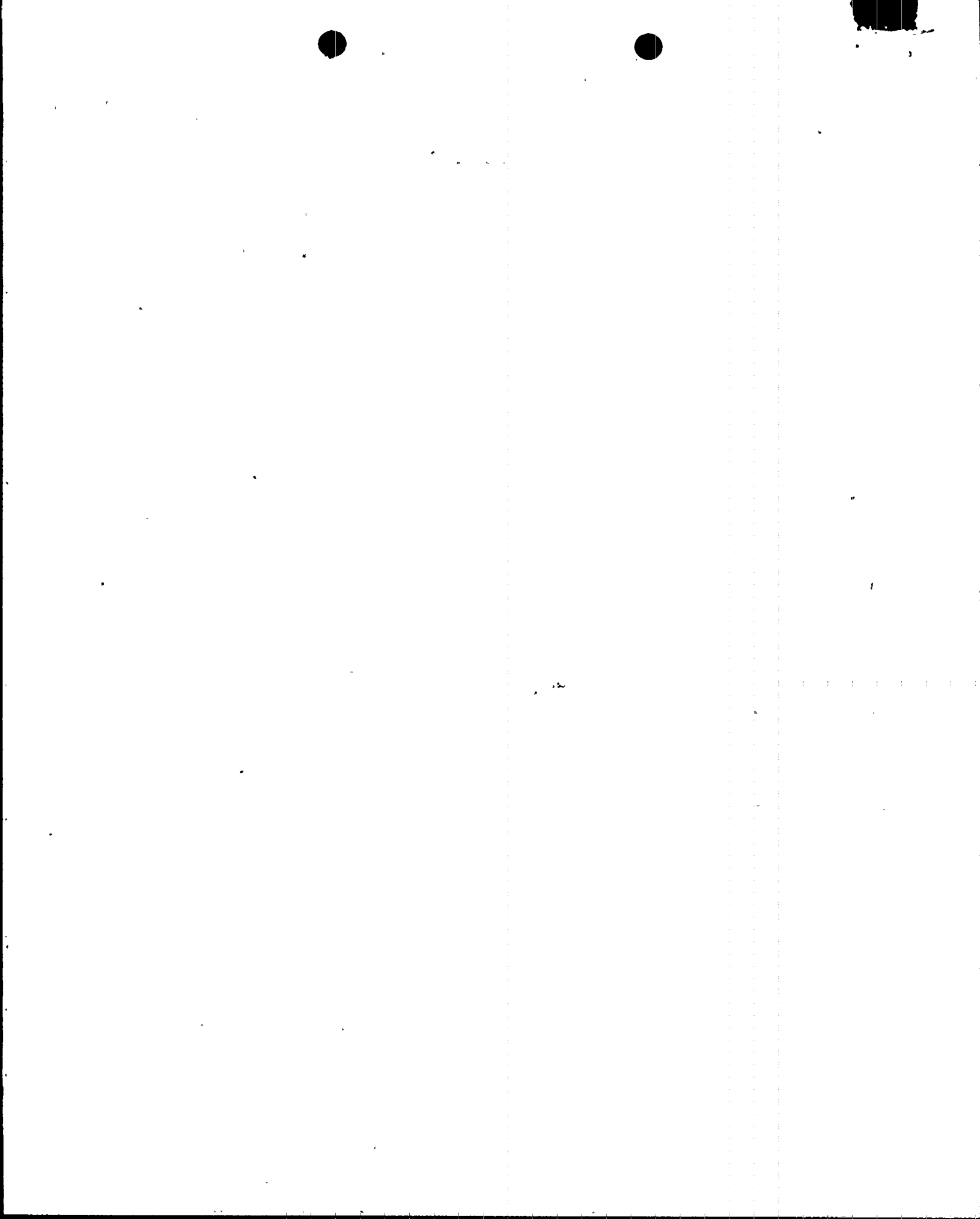
The Intervenor has a substantial need for the requested documents and cannot obtain them elsewhere without undue hardship. Request No. 1 (work schedule) is relevant to contention 4A and 4B and is needed to demonstrate the exposure of radioactive material to a hurricane prone environment during the various stages of the steam generator repair. Documents Nos. 2, 3, 4, and 5 are relevant to contentions 1, 2, and 6. They are needed to identify the constituents of the grit blasting process which has been recently proposed by the Licensee. The airborne radioactivity impacts on public exposure (contentions 1), worker ingested exposure (contention 2), and offsite releases (contention 6).

Dated this 14th day of April, 1981.

LAW OFFICES OF NEIL CHONIN, P.A.  
Attorney for Intervenor  
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Miami, FL 33131  
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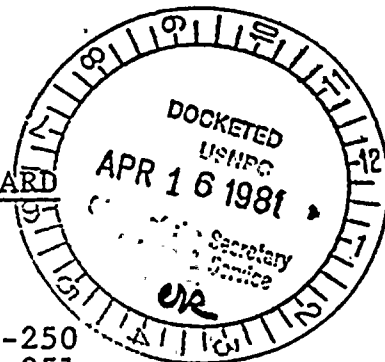
BY:

  
NEIL CHONIN



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  
 : 50-251  
 (Turkey Point Nuclear Generating : (Proposed Amendments to Facility  
 Unit Nos. 3 and 4) : Operating Licenses to Permit Steam  
 : Generators Repair)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of INTERVENOR'S REQUEST FOR PRODUCTION 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 14th day of April, 1981.

Marshall E. Miller, Esq. Administrative Judge  
 Chairman, Atomic Safety and Licensing Board Panel  
 U.S. Nuclear Regulatory Commission  
 Washington, D. C. 20555

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

Dr. Oscar H. Paris, Administrative Judge  
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U. S. Nuclear Regulatory Commission  
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\_\_\_\_\_  
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