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June 12, 1981

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

Re: In the Matter of Florida Power & Light Company
(Turkey Point Nuclear Generating Units Nos. 3 and
4) Docket Nos. 50-250, 50-251 (Proposed Amendments
to Facility Operating License to Permit Steam
Generator Repairs)

Dear Members of the Board:

In its Memorandum and Order of May 28, 1981, the Board
ordered:

- "3. That the parties are directed to file by 4 p.m. June 15, 1981, detailed information concerning the handling, storage, transportation or other disposition to be made of low-level solid waste that may be produced at the Turkey Point facility as a result of the proposed steam generator repairs.
4. That the parties are further directed to state their positions as to whether the Board can or should take any action regarding solid waste resulting from steam generator repairs at Turkey Point, including the imposition of license amendment conditions." (pp. 42-43).

This letter is in response to the Board's order.

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Exhibit I



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The enclosed affidavit of Alan J. Gould, employed by Florida Power & Light Company as a Power Resources Radwaste and Radiochemistry Specialist, addresses the handling of low-level solid wastes generated by the proposed repairs, storage onsite, transportation, and their disposition. The affidavit demonstrates that if it is assumed, for purposes of discussion, that all of the containers in which the relatively low specific activity waste is to be stored, together with the drums of such waste presently stored onsite, were breached by a hurricane, tornado, or some other mechanism, and conservative assumptions are made with respect to how much of the activity in the waste would be released, the consequences of such releases would be bounded by the SGLA accident analyses performed by the NRC Staff and FPL which indicate that the resultant doses would be below 10 CFR Part 20 limits. Consequently, FPL does not believe that the Board should impose any additional license amendment conditions regarding the low-level waste resulting from the repairs in its final order to be entered in this proceeding.

FPL wishes to inform the Board that it is now exploring revision of its schedule for making the repairs. On April 21, 1981, Turkey Point Unit No. 3 suffered an electrical failure within the stator of its electrical generator. The unit was immediately taken off line and subsequently put in a cold shut-down condition. By about May 20, 1981, the electrical generator had been disassembled, the damage was found to be extensive, and the stator was subsequently shipped offsite for

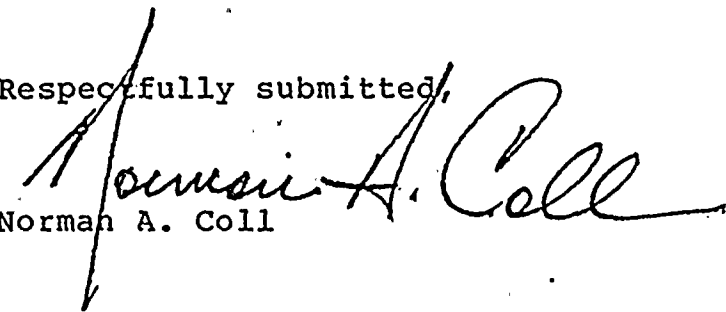


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repair. FPL is presently conducting a required inservice inspection (ISI) on Unit No. 3 while the unit is shut down.

At this moment the length of the outage for Unit No. 3 resulting from the incident is not known precisely, since a number of options are being investigated. A corporate decision concerning the matter will be made very shortly. One of the options under consideration would be to perform the steam generator repairs on Unit No. 3 concurrently with the repairs necessitated by the electrical generator failure. If FPL determines that that course is appropriate, it would wish to begin the steam generator repairs on Unit No. 3 as soon as possible. In fact, some of the preliminary work could commence immediately upon receipt of Board approval and issuance of the license amendments authorizing the repairs, and be done in parallel with ISI work. If FPL performs the steam generator repairs concurrently with the outage caused by the electrical generator failure, the total outage time for Unit No. 3 as well as any resultant replacement power costs would be minimized. The steam generator repairs for Unit No. 4 would follow upon completion of repairs to Unit No. 3. Therefore, if the Board is satisfied that issuance of the final order authorizing the steam generator repairs is justified, FPL would very much appreciate Board action promptly.

Respectfully submitted,


Norman A. Coll

NAC/wpc

cc: See Attached Service List

