

7/18/77  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE  
ATOMIC SAFETY AND LICENSING APPEAL BOARD

Florida Power & Light Company )  
(St. Lucie Plant, Unit No. 1) ) Docket No. 50-335A  
)  
Florida Power & Light Company )  
(Turkey Point Plant, Unit Nos. ) Docket Nos. 50-250A  
3 and 4) ) 50-251A

MOTION OF THE CITY OF QUINCY TO WITHDRAW  
FROM THESE DOCKETS AS AN INDIVIDUALLY  
NAMED PARTY

The City of Quincy, Florida, respectfully requests permission to withdraw its participation in the above-captioned dockets as an individually named party. Quincy wishes to continue to participate indirectly as a member of the Florida Municipal Utilities Association ("FMUA"), an organization of some 34 municipally owned and operated electric utilities in Florida, which has requested intervention in order to protect generally the rights of each of its members.

In support thereof Quincy states as follows:

Florida Cities seek to intervene in this docket in order to have their rights to nondiscriminatory access to competitive power supply confirmed. These rights should not require protection through protracted and expensive litigation. The Cities that have sought intervention individually did so because of the overriding importance of establishing these rights and their belief that they can contribute significantly in the decisional process through individual and active

participation. At the same time, FMUA seeks intervention in the belief that the entitlements sought should be generally available, and it is FMUA's position that license conditions ordered should be made generally applicable.

While Quincy recognizes that Florida Power & Light Company ("FP&L") may assert, or the Board may rule, that if it withdraws as a named intervenor, entitlements that it might otherwise have may be reduced or negated, this City and others like it ought to be able to assert a general public interest in license conditions through a membership association without having to bear the costs and burdens associated with individual and active participation in lengthy, complex large-scale litigation.

Respectfully submitted,



Robert A. Jablon

July 18, 1977

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon the following persons:

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Dated at Washington, D.C. this 18th day of July, 1977.

  
Robert A. Jablon