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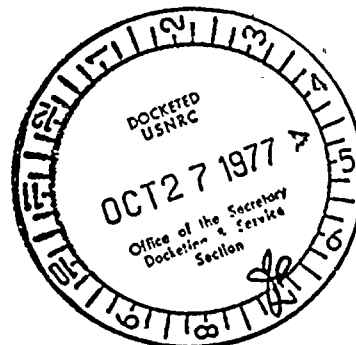
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DAVID R. STRAUS  
BONNIE S. BLAIR  
DAVID A. GIACALONE  
ROBERT HARLEY BEAR  
JAMES CARL POLLOCK

October 25, 1977

Ivan W. Smith, Esquire  
Atomic Safety and Licensing Board  
Nuclear Regulatory Commission  
Washington, D.C. 20555

John M. Frysiak, Esquire  
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Washington, D.C. 20555

Robert M. Lazo, Esquire  
Atomic Safety and Licensing Board  
Nuclear Regulatory Commission  
Washington, D.C. 20555



Re: Florida Power & Light Company  
(St. Lucie Plant, Unit Nos. 1 & 2),  
Docket Nos. 50-335A and 50-389A;  
Florida Power & Light Company  
(Turkey Point Plant, Unit Nos. 3 & 4),  
Docket Nos. 50-250A and 50-251A;  
Florida Power & Light Company (South  
Dade Plant), Docket No. P-636-A.

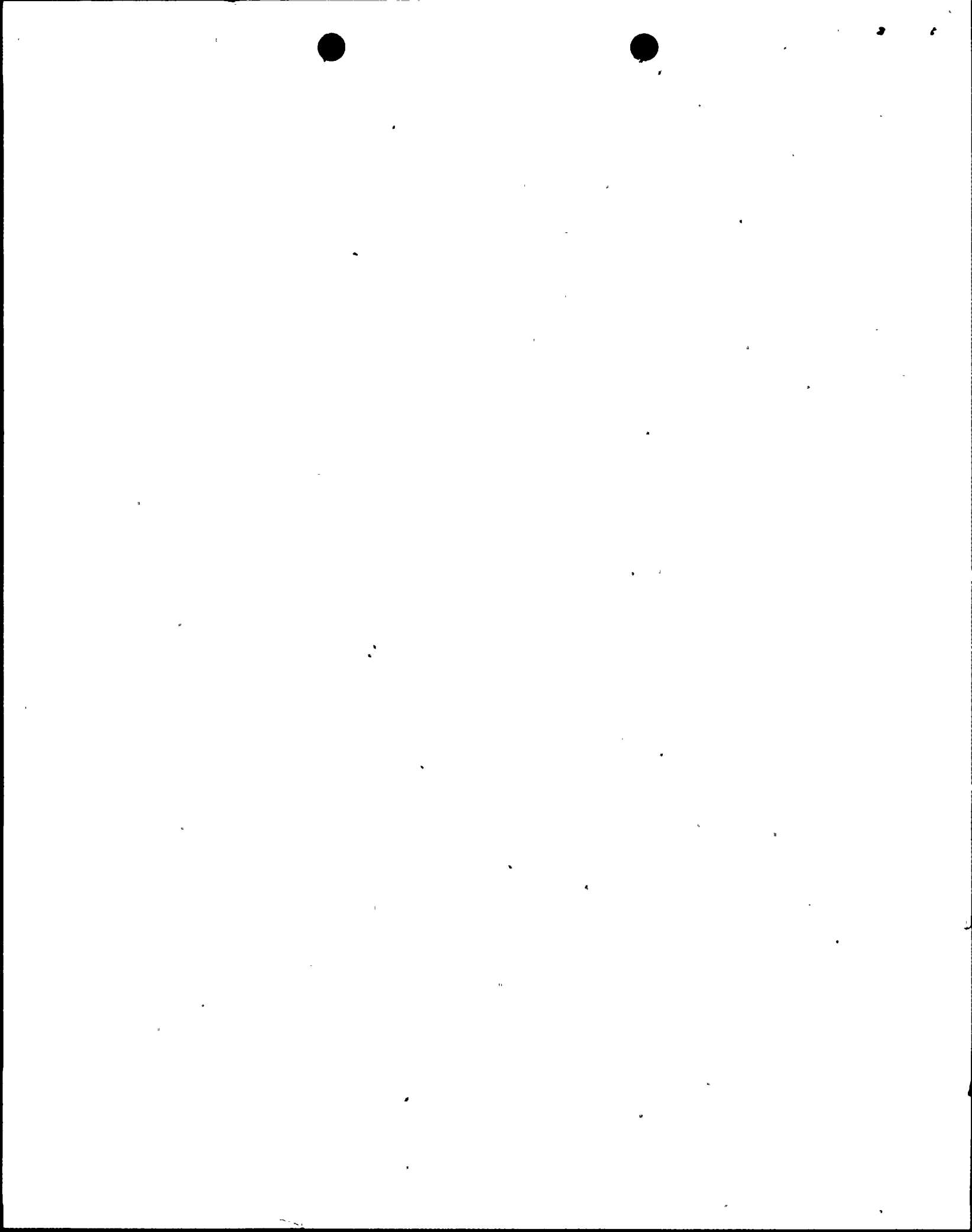
Gentlemen:

The following motions were apparently misdirected to the Appeals Board:

"Notice of Withdrawal of the City of Quincy, Florida," Docket No. 50-389A, filed July 18, 1977.

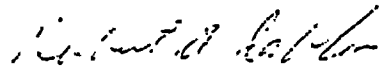
"Motion of the City of Quincy to Withdraw From These Dockets as an Individually Named Party," Docket Nos. 50-335A, 50-250A, and 50-251A; Docket No. 50-389A; Docket No. P-636-A, filed July 18, 1977.

"Motion to Withdraw and Notice of Withdrawal of the City of Daytona Beach, Florida," Docket Nos. 50-335A, 50-389A, 50-250A and 50-251A; Docket No. P-636-A, filed August 5, 1977.



In accordance with those motions, the above cities should be deleted as participants in the intervenor group.

Very truly yours,



Robert A. Jablon

Attorney for the Ft. Pierce Utility Authority of the City of Ft. Pierce, the Gainesville-Alachua County Regional Electric Water and Sewer Utilities, the Lake Worth Utilities Authority, the Utilities Commission of the City of New Smyrna Beach, the Orlando Utilities Commission, the Sebring Utilities Commission, and the Cities of Alachua, Bartow, Ft. Meade, Homestead, Key West, Mount Dora, Newberry, St. Cloud and Tallahassee, Florida, and the Florida Municipal Utilities Association.

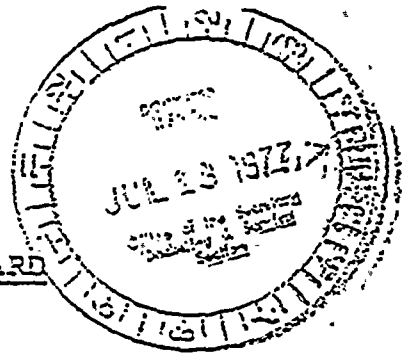
RAJ:tb

Enclosures

cc: All parties to these proceedings



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE  
ATOMIC SAFETY AND LICENSING APPEAL BOARD

Florida Power & Light Company )  
(St. Lucia Plant, Unit No. 2) ) Docket No. 50-389A

NOTICE OF WITEDRAWAL OF THE CITY OF QUINCY, FLOREDA

The City of Quincy, Florida, hereby gives notice of its withdrawal as an individually named party in Florida Power & Light Company (St. Lucia Plant, Unit No. 2), Docket No. 50-389A.

Except insofar as the status of the Motion of the City of Quincy, Florida, to Withdraw From This Proceeding as an Individually Named Party, filed herewith, and this Notice of Withdrawal is concerned, or as matters may arise specifically relating to Quincy, the firm of Spiegel & McDiarmid hereby withdraws its appearance on behalf of Quincy.

Respectfully submitted,

A handwritten signature in cursive script that reads "Robert A. Jablon".

Robert A. Jablon

July 18, 1977

Law Offices of:  
Spiegel & McDiarmid  
2600 Virginia Avenue, N.W.  
Washington, D.C. 20037  
202-333-4500

CERTIFICATE OF SERVICE

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

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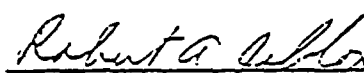
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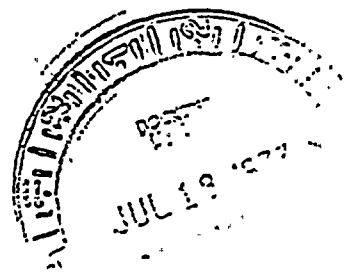
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Robert M. Eazo, Esq.  
Atomic Safety & Licensing  
Board Panel  
Nuclear Regulatory Commission  
Washington, D.C. 20555

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

  
Robert A. Fablon

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 WITEDRAW  
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

Law Offices of:  
Spiegel & McDiarmid  
2600 Virginia Avenue, N.W.  
Washington, D.C. 20037  
202-333-4500



CERTIFICATE OF SERVICE

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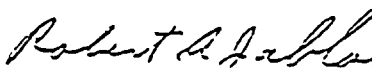
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Robert M. Lazo, Esq.  
Atomic Safety & Licensing  
Board Panel  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dated at Washington, D.C. this 13th day of July, 1977.

  
Robert A. Jablon

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE  
ATOMIC SAFETY AND LICENSING APPEAL BOARD

Florida Power & Light Company )  
(South Dade Unit) ) Docket No. P-636-A

Florida Power & Light Company )  
(St. Lucie Plant, Unit No. 2) ) Docket No. 50-389A

MOTION OF THE CITY OF QUINCY TO WITEDRAW  
FROM THESE PROCEEDINGS AS AN INDIVIDUALLY  
NAMED PARTY

The City of Quincy, Florida, respectfully requests permission to withdraw from the above-captioned proceedings as an individually named party. Quincy maintains its indirect participation 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 intervened herein in order to protect generally the rights of each of its members.

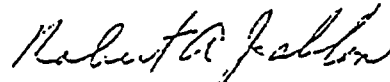
In support thereof Quincy states as follows:

Florida Cities have intervened in these proceedings 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 intervened 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 sought and was granted 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 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

Law Offices of:  
Spiegel & McDiarmid  
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Washington, D.C. 20037  
202-333-4500

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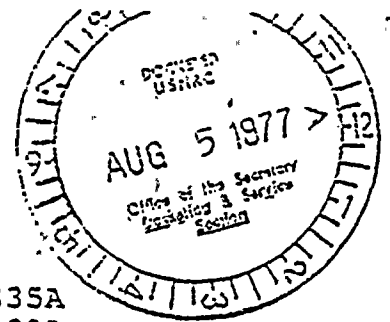
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Robert M. Lazo, Esq.  
Atomic Safety & Licensing  
Board Panel  
Nuclear Regulatory Commission  
Washington, D.C. 20555

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

  
Robert A. Jablon

UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION



<u>Florida Power &amp; Light Company</u>	)	
(St. Lucie Plant, Unit Nos.	)	Docket Nos. 50-335A
1 & 2)	)	50-389A
	)	
<u>Florida Power &amp; Light Company</u>	)	
(Turkey Point Plant, Unit Nos.	)	Docket Nos. 50-250A
3 & 4)	)	50-251A

MOTION TO WITEDRAW AND NOTICE OF WITHDRAWAL OF THE  
CITY OF DAYTONA BEACH,, FLORIDA

The City of Daytona Beach and its residents are served at retail by Florida Power & Light Company ("FP&L"). The City had been considering alternatives to renewal of FP&L's 30-year franchise for electric service which was to terminate this year. It moved to intervene in the above-captioned dockets to attempt to assure that a full range of power supply alternatives would be available to it should it determine either to establish a municipal electric system, or to renew FP&L's franchise but under terms that would allow the City to contract independently for part of its power supply. Recently, however, Daytona Beach has determined to renew FP&L's franchise.

WHEREFORE, Daytona Beach respectfully moves to withdraw its participation in Florida Cities' Joint Petition to Intervene in Florida Power & Light Company (St. Lucie Plant, Unit Nos. 1 & 2), Docket Nos. 50-335A and 50-389A, and (Turkey Point Plant, Unit Nos. 3 & 4), Docket Nos. 50-250A and 50-251A. Except insofar as matters may arise relating to this withdrawal motion

and notice, the firm of Spiegel & McDiarmid hereby withdraws its appearance on behalf of Daytona Beach, Florida.

Respectfully submitted,

*Robert A. Jablon by DR*

Robert A. Jablon

*D. Guttman*

Daniel Guttman

Attorneys for the Ft. Pierce Utilities Authority of the City of Ft. Pierce, the Gainesville-Alachua County Regional Electric Water and Sewer Utilities, the Lake Worth Utilities Authority, the Utilities Commission of the City of New Smyrna Beach, the Orlando Utilities Commission, the Sebring Utilities Commission, and the Cities of Alachua, Bartow, Ft. Meade, Key West, Mount Dora, Newberry, St. Cloud and Tallahassee, Florida, and the Florida Municipal Utilities Association.

August 5, 1977

Law Offices of:  
Spiegel & McDiarmid  
2500 Virginia Avenue, N.W.  
Washington, D.C. 20037  
202-333-4500

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing Motion to Withdraw and Notice of Withdrawal of the City of Daytona Beach, Florida to be served upon the following persons:

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Nuclear Regulatory Commission  
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Robert M. Lazo, Esquire  
Atomic Safety and Licensing  
Board Panel  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dated at Washington, D.C. this 5th day of August, 1977.

  
\_\_\_\_\_  
Daniel Gutman





UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION

Florida Power & Light Company )  
(South Dade Plant) ) Docket No. P-636-A

MOTION TO WITEDRAW AND NOTICE OF WITEDRAWAL OF THE  
CITY OF DAYTONA BEACH, FLORIDA

The City of Daytona Beach and its residents are served at retail by Florida Power & Light Company ("FP&L"). The City had been considering alternatives to renewal of FP&L's 30-year franchise for electric service which was to terminate this year. It moved to intervane in the above-captioned docket to attempt to assure that a full range of power supply alternatives would be available to it should it determine either to establish a municipal electric system, or to renew FP&L's franchise but under terms that would allow the City to contract independently for part of its power supply. Recently, however, Daytona Beach has determined to renew FP&L's franchise.

WHEREFORE, Daytona Beach respectfully moves to withdraw as a party to Florida Power & Light Co. (South Dade Plant), Docket No. P-636-A. Except insofar as matters may arise relating to this withdrawal motion and notice, the firm of Spiegel & McDiarmid hereby withdraws its appearance on behalf of Daytona Beach, Florida.

Respectfully submitted,

*Robert A. Jablon*  
Robert A. Jablon

*Daniel Guttman*  
Daniel Guttman

August 5, 1977

Law Offices of:  
Spiegel & McDiarmid  
2600 Virginia Ave., N.W.  
Washington, D.C. 20037  
202-333-4500

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Robert M. Lazo, Esquire  
Atomic Safety and Licensing  
Board Panel  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dated at Washington, D.C. this 5th day of August, 1977.

  
\_\_\_\_\_  
Daniel Guttman

