

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges
Peter B. Bloch, Chair
Dr. George C. Anderson
Elizabeth B. Johnson

In the Matter of)	Docket Nos. 50-250-OLA-5
)	50-251-OLA-5
FLORIDA POWER & LIGHT)	
COMPANY)	Technical Specifications
Turkey Point Plant)	Replacement
(Unit Nos. 3 and 4))	
)	ASLBP No. 90-602-01-OLA-5
Facility Operating)	
Licenses Nos. DPR-31, DPR-41)	
)	

AFFIDAVIT OF THOMAS J. SAPORITO, JR.

I, Thomas J. Saporito, Jr., being duly sworn, state as follows:

1. I reside at 1202 Sioux Street in Jupiter, Florida which is about (83) miles from the Turkey Point nuclear plant and within the Commission's "geographical zone of interest".

2. I own real and personal property at 1202 Sioux Street in Jupiter, Florida.

3. I am concerned that the operating license amendments sought by the Applicant to revise the Turkey Point technical specifications, will cause the plant to be operated unsafely because of relaxed safety margins in the revised technical specifications. I believe that operation of the Turkey Point nuclear plant with the revised technical specifications will result in a release of radioactive fission products which will adversely affect my health, safety and well-being and contaminate my real and personal property at 1202 Sioux Street in Jupiter, Florida.

4. I am the Executive Director of the Nuclear Energy Accountability Project located in Jupiter, Florida. I also hold the positions of President and Treasurer in the organization.

5. As the Executive Director of the Nuclear Energy Accountability and representing the organizations interests, I am concerned that the operating license amendments sought by the Applicant to revise the Turkey Point technical specifications, will cause the plant to be operated unsafely because of relaxed safety margins in the revised technical specifications. I believe that operation of the Turkey Point nuclear plant with the revised technical specifications will result in a release of

radioactive fission products which will adversely affect the Nuclear Energy Accountability Project's member's health, safety and well-being and contaminate their real and personal property and the property of the organization.

6. I am employed as an Instructor (teacher) at the ATI Career Training Center located at 19st in Miami, Florida and I teach digital electronics and microprocessor technology on the weekdays of Monday through Thursday for six hours per day. As a direct result of this employment, I incur travel time of two hours per day and prepare lesson plans for four hours per day within the Commission's "geographical zone of interest" for each day worked.

7. As the Executive Director for the Nuclear Energy Accountability Project, I conduct extensive research at the legal library in Coral Gables, (South Miami), Florida and the Florida International Library (NRC PDR) located in South Miami. This research is primarily performed on Fridays, Saturdays and Sundays, however, I have frequently conducted research at these facilities on the weekdays of Monday through Thursday.

8. I would estimate my research time to be anywhere from five to twenty hours per week fulfilling my responsibilities as the Executive Director of the Nuclear Energy Accountability Project.

9. As the Executive Director of the Nuclear Energy Accountability Project, I am authorized to represent the interests of the organization and the interests of the organization's members.

10. I have worked in the technical field of analog and digital electronics related to instrument repair and calibration for a period of about seventeen (17) years.

11. I was employed by the Applicant for a period of about seven (7) years in the position of Instrument Control Specialist and I have work experience at the Applicant's Turkey Point nuclear plant and St. Lucie nuclear plant. My duties involved technical analysis and resolution of system problems which involved testing, calibration and repair of sophisticated electronic instrumentation utilized for monitoring and controlling the fission process and other plant safety and non-safety related systems.

12. As an employee of the Applicant, I was provided rigorous training and testing throughout my career with the Applicant. I was directly involved with plant systems related to security monitoring and detection systems, environmental security and safeguards system, reactor protection system, reactor rod drive control and monitoring system, flow control systems, pressure control systems, pressurizer control and monitoring systems, reactor vessel incore and excore monitoring systems, reactor flux mapping system, containment leak rate systems, containment leak detection systems, area radiation monitoring systems, perimeter radiation monitoring systems, reactor primary system loose parts monitoring system, condensate flow rate monitoring system, steam generator feed pump control and monitoring system, condensate polishing system, water plant systems inclusive of the intake cooling water system, circulating water system and component cooling water system, reactor residual heat removal system and many other plant systems related to the control and monitoring of equipment supporting the fission process.

13. I hold an Associates Degree in Electronics Technology and numerous diplomas from various technical training seminars which I have attended in my career of seventeen (17) years.

14. I hold a current United States patent for a Renal Dialysis Concentrate Delivery System which I designed and built.

15. My current position as an Instructor in the field of digital electronics and microprocessor technology keeps me abreast of changes in the current technology.

16. As the Executive Director of the Nuclear Energy Accountability Project and in consideration of my education, training and actual work experience, I believe that I am qualified to represent the interests of the organization's members.

17. As the Executive Director of the Nuclear Energy Accountability Project and in consideration of my education, training and actual work experience, I satisfy the requirements of the Applicant's Turkey Point nuclear plant for the position of Plant Engineer - Instrument and Control.

Pursuant to the current Turkey Point plant technical specifications at 6.1.3.1(f), page 6.1-3, the qualifications of the Plant Engineer - Instrument and Control state that:

"The Plant Engineer - Instrument and Control shall have a minimum of five years experience in instrumentation and control, of which a minimum of six months shall be in nuclear instrumentation and control. A minimum of two years of this five years experience should be related technical training. A maximum of four years of this five years experience may be fulfilled by related technical or academic

training."

18. In consideration of my education, training and actual work experience and because I am qualified as a Plant Engineer - Instrument and Control by the Applicant's Turkey Point technical specifications, I can provide expert testimony on matters related to these proceedings.

Sworn before me this 28th
day of February, 1990.

Thomas J. Gaporito, Jr.
Thomas J. Gaporito, Jr.
1202 Sioux Street
Jupiter, Florida 33458

Doris M. McDonald
Notary

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: DEC. 22, 1991.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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CERTIFICATE OF SERVICE

I hereby certify that copies of "PETITIONERS AMENDED PETITION FOR INTERVENTION AND BRIEF IN SUPPORT THEREOF" in the above captioned proceeding, were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below.

Honorable Peter B. Bloch, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Janice E. Moore, Esq.
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Washington, D.C. 20555

Attn. Chief Docketing/Service Sect.
(Original plus two copies)

Dated this 5th day of March,
1990 at Jupiter, Florida.


Thomas J. Saporito, Jr.
Executive Director, NEAP