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RELATED CORRESPONDENCE

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 MAY 30 110:44

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	Docket Nos. 50-250-OLA
)	50-251-OLA
FLORIDA POWER AND LIGHT COMPANY)	
)	ASLBP No. 84-496-03 LA
(Turkey Point Nuclear Generating)	
Units 3 & 4))	

LICENSEE INTERROGATORIES
 TO INTERVENORS CENTER
 FOR NUCLEAR RESPONSIBILITY AND
 JOETTE LORION

Licensee Florida Power & Light Company hereby requests that the Center for Nuclear Responsibility and Joette Lorion (Intervenors), pursuant to 10 C.F.R. § 2.740(b) and the Licensing Board's Prehearing Conference Order of May 16, 1984, answer each of the following interrogatories fully in writing, under oath or affirmation, within 14 days after service.

For each response to the interrogatories listed below, identify the person or persons who prepared, or substantially contributed to the preparation of, the response. Further, the interrogatories are to be considered the Intervenors' continuing obligation. Accordingly, if -- after answering

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these interrogatories -- additional information comes to Intervenor's attention with respect to one or more of the answers, the answers should be amended in a timely manner to provide such additional information.

Contention b

- b-1 State whether you intend to call any person or persons as witnesses, including expert witnesses, in this proceeding in support of Contention b and, if so, provide the names, addresses, educational backgrounds, and professional qualifications on any such person or persons.

- b-2 Provide summaries of the views, positions, or proposed testimony on Contention b of all persons named in response to Interrogatory No. b-1 that you intend to present during this proceeding.

- b-3 Identify by author, title, date of publication and publisher, all books, reports and papers that you intend to employ or rely upon in presenting your direct case on Contention b.

- b-4 Identify by author, title, date of publication and publisher, all books, reports and papers that you intend to employ or rely upon in conducting your cross-examination of prospective Licensee witnesses testifying in connection with Contention b.

- b-5 If the representations made in Contention b are based in whole or in part on any documents prepared by the Licensee or the NRC Staff which you contend are deficient, specify which documents and the particular portions thereof you regard as deficient and explain in what way they are deficient.
- b-6 Identify by name and publication number the "entirely new computer model" referred to in Contention b.
- b-7 Do Intervenors contend that the Emergency Core Cooling System (ECCS) evaluation model employing the new computer model identified in response to Interrogatory No. b-6 has not been accepted by the Nuclear Regulatory Commission for performing ECCS analyses pursuant to the requirements of 10 C.F.R. § 50.46?
- b-8 Identify by author, title, date of publication and publisher all books, reports and papers relied upon in support of the statement in Contention b that "Re-flood rates are critical if below 1 or 2 inches per minute."
- b-9 Do Intervenors contend that use of "the entirely new computer model" results in failure to meet the ECCS acceptance criteria of 10 C.F.R. § 50.46 or any other regulatory requirements at Turkey Point?

b-10 If the answer to Interrogatory No. b-9 is "Yes," identify the particular criterion, criteria or other regulatory requirements which Intervenors contend will not be satisfied at Turkey Point.

Contention d

- d-1 State whether you intend to call any person or persons as witnesses, including expert witnesses, in this proceeding in support of Contention d and, if so, provide the names, addresses, educational backgrounds, and professional qualifications on any such person or persons.
- d-2 Provide summaries of the views, positions, or proposed testimony on Contention d of all persons named in response to Interrogatory No. d-1 that you intend to present during this proceeding.
- d-3 Identify by author, title, date of publication and publisher, all books, reports and papers that you intend to employ or rely upon in presenting your direct case on Contention d.
- d-4 Identify by author, title, date of publication and publisher, all books, reports and papers that you intend to employ or rely upon in conducting your cross-examination of prospective Licensee witnesses testifying in connection with Contention d.

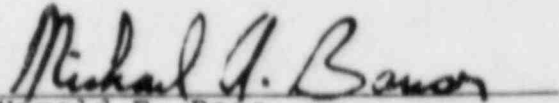
d-5 If the representations made in Contention d are based in whole or in part on any documents prepared by the Licensee or the NRC Staff which you contend are deficient, specify which documents and the particular portions thereof you regard as deficient and explain in what way they are deficient.

d-6 Identify by author, title, date of publication and publisher, all books, reports and papers relied upon in support of the statement in Contention d that, "If the minimum allowable DNBR is reduced from 1.3 to 1.7 [sic] as proposed, this would authorize operation of the fuel much closer to the upper boundary of of the nucleate boiling regime."

d-7 Do Intervenors contend that the "proposed decrease in the departure in the nucleate boiling ratio" results in failure to meet the ECCS acceptance criteria of 10 C.F.R. § 50.46 or any other regulatory requirements at Turkey Point?

d-8 If the answer to Interrogatory d-8 is "Yes," identify the particular criterion, criteria or other regulatory requirements which Intervenors contend will not be satisfied at Turkey Point..

Respectfully submitted,



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Dated: May 29, 1984

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NUCLEAR REGULATORY COMMISSION

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FLORIDA POWER AND LIGHT COMPANY)	50-251 OLA
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee Interrogatories to Intervenors Center for Nuclear Responsibility and Joette Lorion," dated May 29, 1984, were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below.

Dr. Robert M. Lazo, Chairman
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Chief, Docketing and Service Section
(original plus two copies)

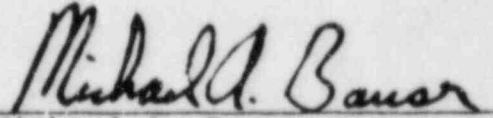
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Dated this 29th day of May 1984.


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