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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '89 SEP 12 A10:04

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
FLORIDA POWER & LIGHT COMPANY)	Docket Nos. 50-250 OLA-4
(Turkey Point Plant,)	50-251 OLA-4
Units 3 and 4))	

INTERVENORS' RESPONSE TO
LICENSEE'S FOLLOW-UP DISCOVERY
REQUEST TO THE CENTER FOR NUCLEAR
RESPONSIBILITY AND JOETTE LORION

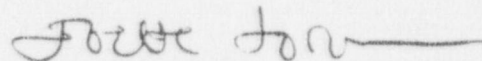
Intervenors, the Center for Nuclear Responsibility and Joette Lorion hereby provide their responses to Licensee's follow-up discovery request:

Response to Interrogatory 1 (a): Intervenors would agree that the NRC Staff has accepted the methods identified in Revision 2 to Regulatory Guide 1.99 as appropriate for determining the adjusted reference temperature (ART) of the materials of reactor vessels in general and the materials of the Turkey Point reactor vessels in particular. Intervenors are currently researching the issue of whether the use of Revision 2 for the aged Turkey Point reactors is appropriate for determining the ART. Intervenors believe that the use of Revision 2 may not be the most conservative method for calculating the ART for the aged reactor vessels. In addition, Intervenors do not believe the use of Revision 2, part 2 to calculate the ART for Turkey Point Unit 4 is either appropriate or conservative.

Response to Interrogatory 2 (b): At this time, Intervenors are not aware of specific statements or provisions in Revision 2 that are inappropriate. Intervenors believe that it is the Licensee's use of Section 2 of the regulatory guide to predict ART for Unit 4 that is inappropriate. Intervenors believe that Licensee does not meet the criteria for an Integrated Surveillance Program, thus use of the combined Unit 3 and 4 data is not appropriate and not conservative. Intervenors believe that the Unit 4 plant specific surveillance data is the only credible data that can be used to predict ART and set P/T limits for Unit 4.

Response to Interrogatory 2 (c) : As stated in response to 2 (b) Intervenors do not believe that FPL properly implemented Revision 2 for determination of the ART for Unit 4, because Intervenors do not believe that Turkey Point Units 3 and 4 meet the criteria for an integrated surveillance program, and thus Licensee is underestimating the ART and not being conservative in their setting of the P/T limits for Unit 4. Licensee did not properly implement Revision 2, because they used Section 2 of the guide to calculate ART and set the P/T limits for Unit 4.

Respectfully submitted,



Joette Lorion
Director, Center for Nuclear
Responsibility
7210 Red Road #217
Miami, Fl. 33143
(305) 661-2165

Dated: September 8, 1989

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'89 SEP 12 A10:05

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
FLORIDA POWER & LIGHT CO.) Docket Nos. 50-250 OLA
) 50-251 OLA
Turkey Point Plant)
Units 3 and 4) (Pressure/Temperature Amendments)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Intervenors' Responses to Licensee's Follow-up Discovery Request to the Center for Nuclear Responsibility and Joette Lorion" have been served on the following by deposit in the United States Mail, first class, properly stamped and addressed on the date shown below:

Dr. Paul Cotter
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

John T. Butler
Steel, Hector & Davis
4000 SE Financial Center
Miami, Florida 33131

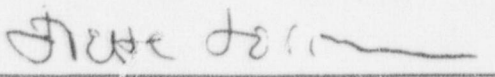
Glenn O. Bright
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Steven P. Frantz
Newman & Holtzinger P.C.
1615 L. Street NW
Suite 1000
Washington, DC 20036

Jerry Harbour
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Janice Moore
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


Joette Lorion
Director, Center for
Nuclear Responsibility
7210 Red Road #217
Miami, Florida 33143
(305) 661-2165

Date: September 8, 1989

* John Butler was hand delivered a response on September 8, 1989.

STATE OF FLORIDA
COUNTY OF DADE

Before me the undersigned authority, personally appeared
JOETTE LORION, who after being duly sworn deposes and says
that the foregoing INTERVENORS' RESPONSE TO LICENSEE'S FOLLOW
UP DISCOVERY REQUEST TO THE CENTER FOR NUCLEAR RESPONSIBILITY
AND JOETTE LORION propounded on the 8th day of
September, 1989, are true and correct to the best of
her knowledge and ability, and that she has read the RESPONSES
and knows the content thereof.

Carmen Z. Alayto

Notary Public, State
of Florida at Large

MY COMMISSION EXPIRES:

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP JUNE 13, 1991