

RAS 2499

December 8, 2000

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

| | | |
|-------------------------------|---|------------------------|
| In the Matter of |) | |
| |) | Docket Nos. 50-250-LR |
| Florida Power & Light Company |) | 50-251-LR |
| |) | ASLBP No. 01-786-03-LR |
| (Turkey Point Units 3 and 4) |) | |

**FPL'S RESPONSE TO REQUEST FOR HEARING AND
PETITION FOR LEAVE TO INTERVENE OF JOETTE LORION**

Florida Power & Light Company ("FPL") hereby responds to the Request for Hearing and Petition for Leave to Intervene filed by Joette Lorion in this proceeding on November 22, 2000. FPL does not contest Ms. Lorion's standing to participate as a party in this proceeding, which concerns FPL's application to renew the operating licenses for Turkey Point Units 3 and 4, provided Ms. Lorion later timely identifies at least one admissible contention.

Ms. Lorion's petition identifies a number of issues. FPL construes these issues as the identification of the aspects of the subject matter as to which Ms. Lorion wishes to intervene, as required by 10 C.F.R. § 2.714(b)(2). Virtually all of the issues raised by Ms. Lorion appear to be challenges to the NRC's regulations or to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437), and outside the scope of this proceeding. Indeed, sections I and II of Ms. Lorion's filing appear to be a general objection to the NRC's license renewal process, while section III is described as a list of issues "that should be raised in a site-specific SEIS process and eventually in a hearing, preferably after the NEPA process is completed." In accordance with the Atomic Safety and Licensing Board's Memorandum and

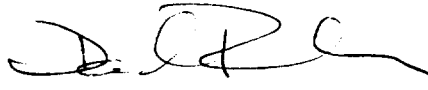
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Order of December 1, 2000, FPL will respond by January 9, 2001, to any specific contentions that Ms. Lorion may proffer in a supplement to her intervention petition.

As a final matter, FPL notes that Ms. Lorion failed to serve her petition on FPL, as required by the notice of opportunity for hearing published by the NRC for this proceeding and by the NRC's Rules of Practice. FPL requests that all pleadings in this proceeding be served on the counsel identified below.

Respectfully Submitted,



David R. Lewis

Mitchell S. Ross

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Dated: December 8, 2000

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "FPL's Response to Request for Hearing and Petition for Leave to Intervene of Joette Lorion," dated December 8, 2000, were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid, and where indicated by an asterisk by e-mail or facsimile, this 8th day of December, 2000.

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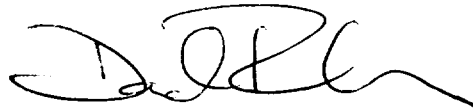
Atomic Safety and Licensing Board Panel
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A handwritten signature in black ink, appearing to read 'D. R. Lewis', with a horizontal line underneath it.

David R. Lewis

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