

**UNITED STATES NUCLEAR REGULATORY COMMISSION
BEFORE THE EXECUTIVE DIRECTOR FOR OPERATIONS**

In the Matter of:

SAPRODANI ASSOCIATES,

DATE: 08 MAR 2016

and

THOMAS SAPORITO

Petitioner,

v.

**FLORIDA POWER & LIGHT COMPANY
ST. LUCIE NUCLEAR POWER PLANT - UNITS 1&2
TURKEY POINT NUCLEAR POWER PLANT – UNITS 3&4**

and

**ALL NRC LICENSEES,
(w/similarly designed commercial nuclear power stations)**

Licensee.

**PETITION UNDER 10 C.F.R. §2.206
SEEKING ENFORCEMENT ACTION AGAINST
THE ABOVE-CAPTIONED NRC LICENSEES**

NOW COMES, SaproDani Associates, by, through and with, Thomas Saporito, Senior Consultant for SaproDani Associates (hereinafter "Petitioner") and submits a *Petition Under 10 C.F.R. §2.206 Seeking Enforcement Action Against The Above-Captioned NRC Licensees* related to operation of licensed commercial nuclear power stations – (hereinafter "Petition"). For the reasons stated below, the U.S. Nuclear Regulatory Commission (NRC) should grant the Petition as a matter of law:

NRC HAS JURISDICTION AND AUTHORITY TO GRANT PETITION

The NRC is the government agency mandated by the United States Congress to protect public health and safety - and the environment - related to operation of civilian