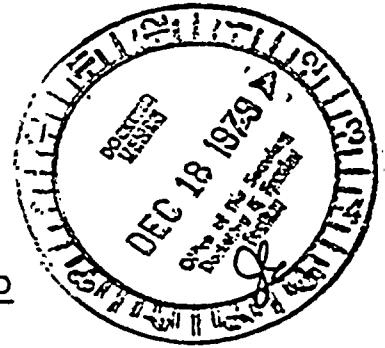


12-18-79



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. <u>50-250</u>
FLORIDA POWER AND LIGHT COMPANY)	50-251
(Turkey Point Nuclear Generating)	(Proposed Amendments to Facility
Unit Nos. 3 and 4))	Operating Licenses to Permit
)	Steam Generator Repair)

INTERVENOR'S ANSWERS TO THE NRC STAFF
INTERROGATORIES AND REQUEST FOR THE PRODUCTION
OF DOCUMENTS

Intervenor hereby answers the NRC Staff Interrogatories and Request for Production of Documents.

Intervenor will amend the interrogatories pursuant to 10 CFR Section 2.740(e). Supplementation asked for beyond the scope of the requirements of the rule are objected to as not being required.

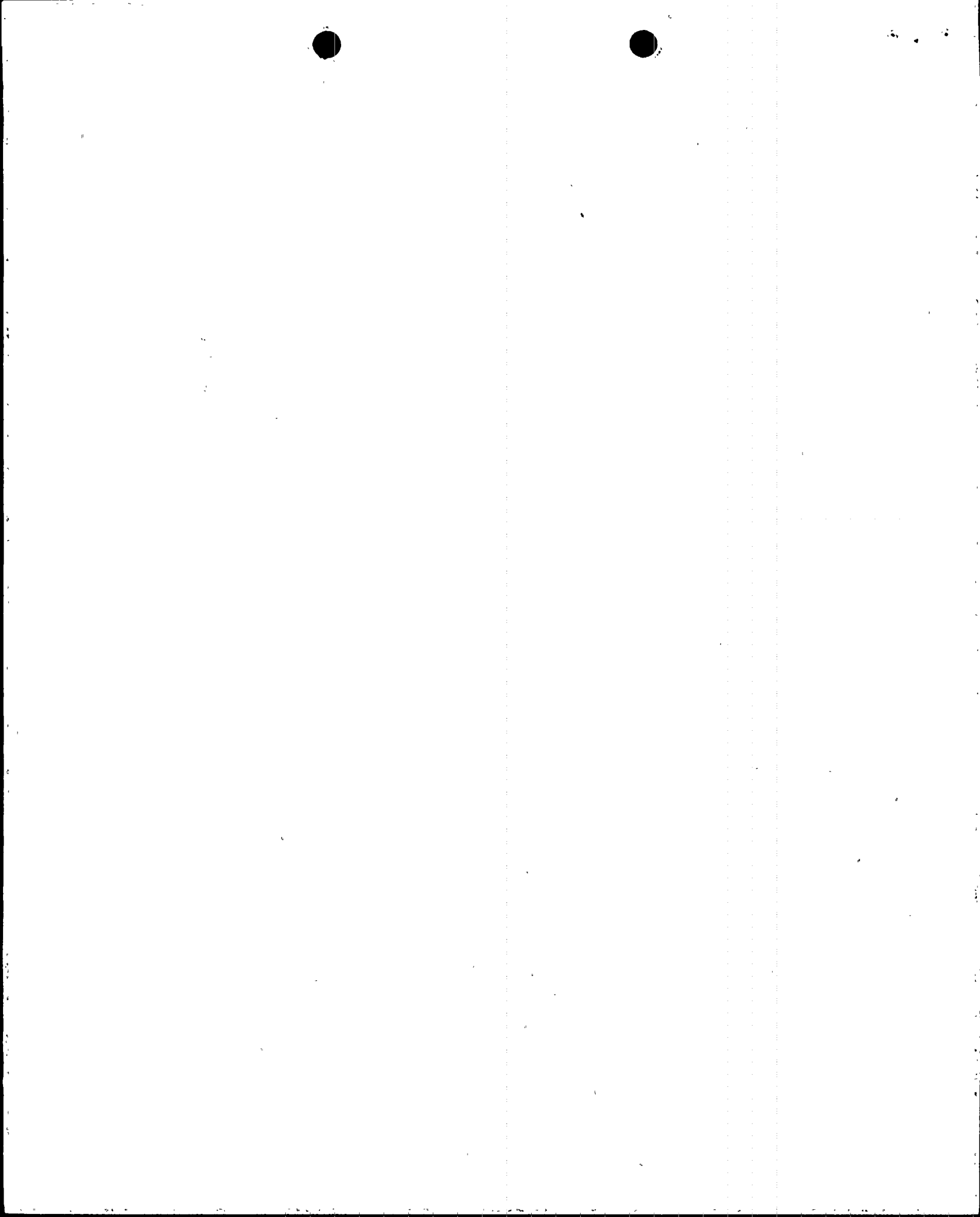
Contention 1.

1-1. a. Yes.

b. The following witnesses Intervenor has confirmed for the hearings: Dr. Arthur Bowen, Ph.D., Department of Architecture and Planning, School of Engineering and Architecture, University of Miami, Coral Gables, Florida 33124. Please refer to Dr. Bowen's attached resume.

Dr. Walter Goldberg, Ph.D., Florida International University, Department of Biological Studies. Ph. D. in Oceanography from the University of Miami, Miami, Florida in 1973. Specializes in radio-ecological studies of the impacts of radionucleoids on marine organisms and the marine environments. He is a member of the Health Physics Society. He has served as consultant to the Florida Department of Environmental Regulation.

Dr. Robert Anderson, Ph.D., Department of Materials Engineering, San Jose State College, San Jose, California. At the present time Intervenor is unable to provide the NRC Staff with Dr. Anderson's



educational background and professional qualifications, however the answer will be supplemented.

Dale Bridenbaugh, M.H.B. Technical Associates, 1723 Hamilton Avenue, Suite K, San Jose, California 95125. Past employee of the Nuclear Division of General Electric Company, 1955-1976.

Dr. Karl Z. Morgan, Ph.D., Neely Professor, School of Nuclear Engineering, Georgia Institute of Technology, Atlanta, Georgia. Ph.D. from Duke University. He is a past president of the Health Physics Society.

Dr. Arthur R. Tamplin, Ph.D., National Resources Defense Council, 1025 I. Street, N.W., Washington D.C. 2006, Ph.D. University of California at Berkely in biosphysics. Employee, Lawrence-Livermore Laboratory, 1963-1974.

Intervenor intends to call additional witnesses in the areas of atmospheric sciences, radiochemistry, hydrology and soil engineering, alternative energy technologies, health physics, and economics. However at the present time none of the witnesses contacted in these fields are confirmed. Intervenor will supplement the answer when the information becomes available.

1-2. Witnesses have not conducted their analysis of the contention to a sufficient degree to provide definitive answers to this interrogatory.

1-3. Not determined at this time.

1-4. Not determined at this time.

1-5. Intervenor considers the Steam Generator Repair Report, The NRC STAFF Safety Evaluation Report and Environmental Impact Appraisal to be deficient.

The following sections of the SGRR Intervenor considers to be deficient. Sections 1.0, 1.1.4, 1.1.5, 1.1.6, 1.1.7, 1.3, 1.4, 2.2, 2.2.1.5, 2.2.1.8, 2.2.2.1, 3.3.4.1, 3.3.4.2, 3.3.4.3, 3.3.4.4, 3.3.5, 3.3.5.1, 3.3.6.3, 3.3.7.1, 3.3.7.2, 3.3.7.3, 3.4, and 3.4.1.

Intervenor also considers Sections 3.4.2, 3.4.5.4, 3.4.6, 3.4.7, 3.4.8,, Table 3.3-2, Table 3.4-1, Table 3.4-2, Table 3.4-4, 4.0, 5.2.2, 5.2.2.1, 5.2.2.2, 5.2.2.3, 5.2.2.4, 5.2.2.5, Table 5.2-1, Table 5.2-3, Table 5.2-4, Table 5.2-5, Table 5.2-6, Table 5.2-7, 6.1, 6.2.2, 6.3.2, 6.4.1, 6.4.2, 6.5, 6.6.2, 6.6.3, Table 6.2-1, 7.1, 7.2, 7.3 of the SGRR to be deficient.

Intervenor considers the following sections of the SER to be deficient: 2.2, 2.1, 2.4, 2.5, 2.6, 2.6.1.1, 2.6.1.2, 2.6.1.3, 2.6.1.4; 2.6.1.5, 2.6.2, 2.6.3, 2.6.4, 2.6.5, 2.6.6, 2.7, 3.1, 3.2.1, 3.3.1, Table 3.3-1, 3.3.2, 3.4.1, 3.4.2, Table 3.4-1, 3.5 and 4.0.

Intervenor considers the following sections of the EIA to be deficient: 4.1.1, Table 4.1, 4.1.2, Table 4.2, 4.2, 4.3, 5.0, 5.1, 5.4, 6.0.

Intervenor objects to that portion of interrogatory 1-5 which calls for an explanation of why Intervenor regards portions of documents deficient on the grounds that the request calls for trial preparation materials, opinions and analysis made in anticipation of the hearings without any special showing of substantial need as required by 10 CFR § 2.740 (b) (2).

1-6. The National Environmental Policy Act, 42 U.S.C. § 4332 (2) (C).

1-7. Not applicable since the Licensing Board's Order of September 25, 1979.

1-8. 10 CFR § 51.5 (a) (1) and (b) (2) and § 51.20.

1-9. Not applicable since the Licensing Board's Order of September 25, 1979.

1-10. Intervenor objects to this interrogatory. It is argumentative. Contention 1 contends that an EIS must be prepared by the NRC Staff. Further, the interrogatory calls for trial preparation material without the requisite special showing required by 10 CFR § 2.740 (b) (2).

1-11. No longer applicable since the Licensing Board's Order of September 25, 1979.

Contention 2.

2-1. a. Yes.

b. Karl Z. Morgan, Arthur R. Tamplin, and Dale Bridenbaugh. See the answer to interrogatory 1-1(b), for data on these witnesses.

2-2. Witnesses have not completed their analysis of the subject matter at issue in Contention 2 to a sufficient degree of certainty to provide a definitive answer.

2-3. Not determined at this time.

2-4. Not determined at this time.

2-5. Intervenor considers the following sections of the SGRR to be deficient: 1.1.2, 1.1.4, 1.1.6, 2.1.2, 3.3.4.1, 3.3.4.2, 3.3.4.3; 3.3.4.4, 3.3.4.5, 3.3.5, 3.3.5.1, 3.3.5.2, 3.3.5.3, 3.3.5.4, 3.3.5.5, 3.3.6.1, 3.3.6.2, 3.3.6.3, 3.3.7.1, 3.3.7.2, 3.3.7.3, 3.4.1, Table 3.3-2, 4.0, 5.2.2.1, 5.2.2.2, Table 5.2-3, Table 5.2-2, 6.1, 6.6.2, 6.6.3, 7.6, 7.9, Table 7.4-1, A-15-1, A-33-1, A-40-1, A-40-2.

Intervenor considers the following sections of the SER to be deficient: 2.4, 2.5, 2.6, 2.6.1.1, 2.6.1.2, 2.6.1.3, 2.6.1.4, 2.6.1.5, 2.6.3, 2.6.4, 2.6.5, 2.7, 3.4.2, 3.5, 4.0.

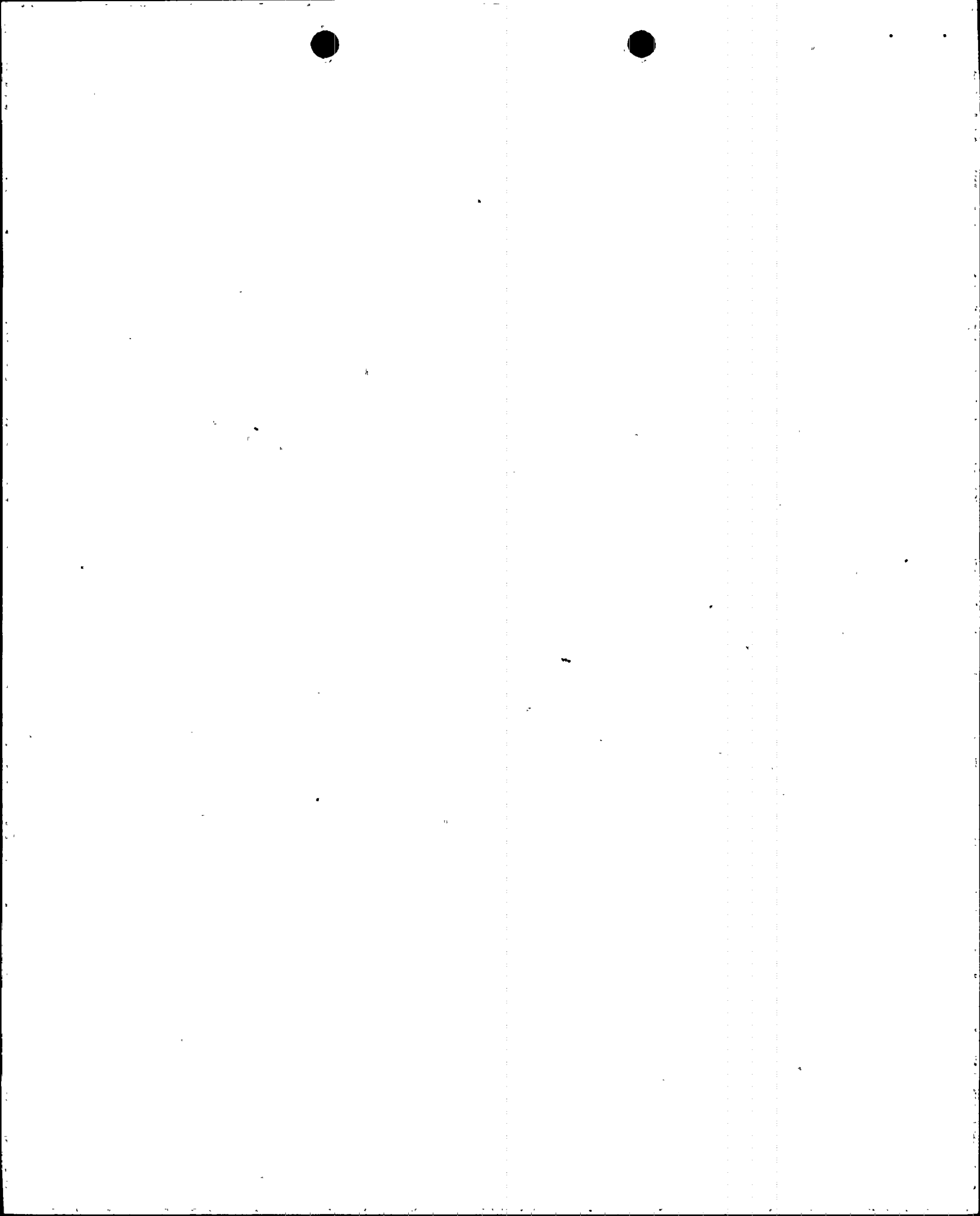
Intervenor considers the following sections of the EIA to be deficient. 4.1.1, Table 4.1, 5.0, 5.1, 6.0.

Intervenor objects to the requirement of an explanation of why each section is deficient because it asks for trial preparation material without the showing of substantial need of the materials. 10 CFR § 2.740 (b).

2-6. 10 CFR § 20.101, 20.102, 20.103, 20.206, and 20.401.

2-7. Not applicable.

2-8. Not applicable.



2-9. Yes. See answer 2-2.

Contention 3.

3-1. a. Yes.

b. Dr. Arthur Tamplin, Dale Bridenbaugh, and Dr. Robert Anderson. See the answer to interrogatory 1-1(b) for data on these witnesses.

3-2. See responses to interrogatories 1-2 and 2-2.

3-3. Not determined at this time.

3-4. Not determined at this time.

3-5. Intervenor considers the following sections of the SGRR to be deficient: 1.1.5, 1.3, 3.3.4.4, 3.3.6.3, 3.4.5.4, 3.4.6, 5.2.2, 5.2.2.4, 5.2.2.5, 6.1, 6.3.2, 6.5, 8.1, 8.2, Table 5.2-4, Table 5.2-5, Table 5.2-6, Table 5.2-7, A-32-1, D-6-1.

Intervenor considers the following sections of the SER to be deficient: 2.6.2, 2.6.4, 3.4.2, and 4.0.

Intervenor considers the following sections of the EIA to be deficient: 4.1.2, 5.0, 6.0, Table 4.2.

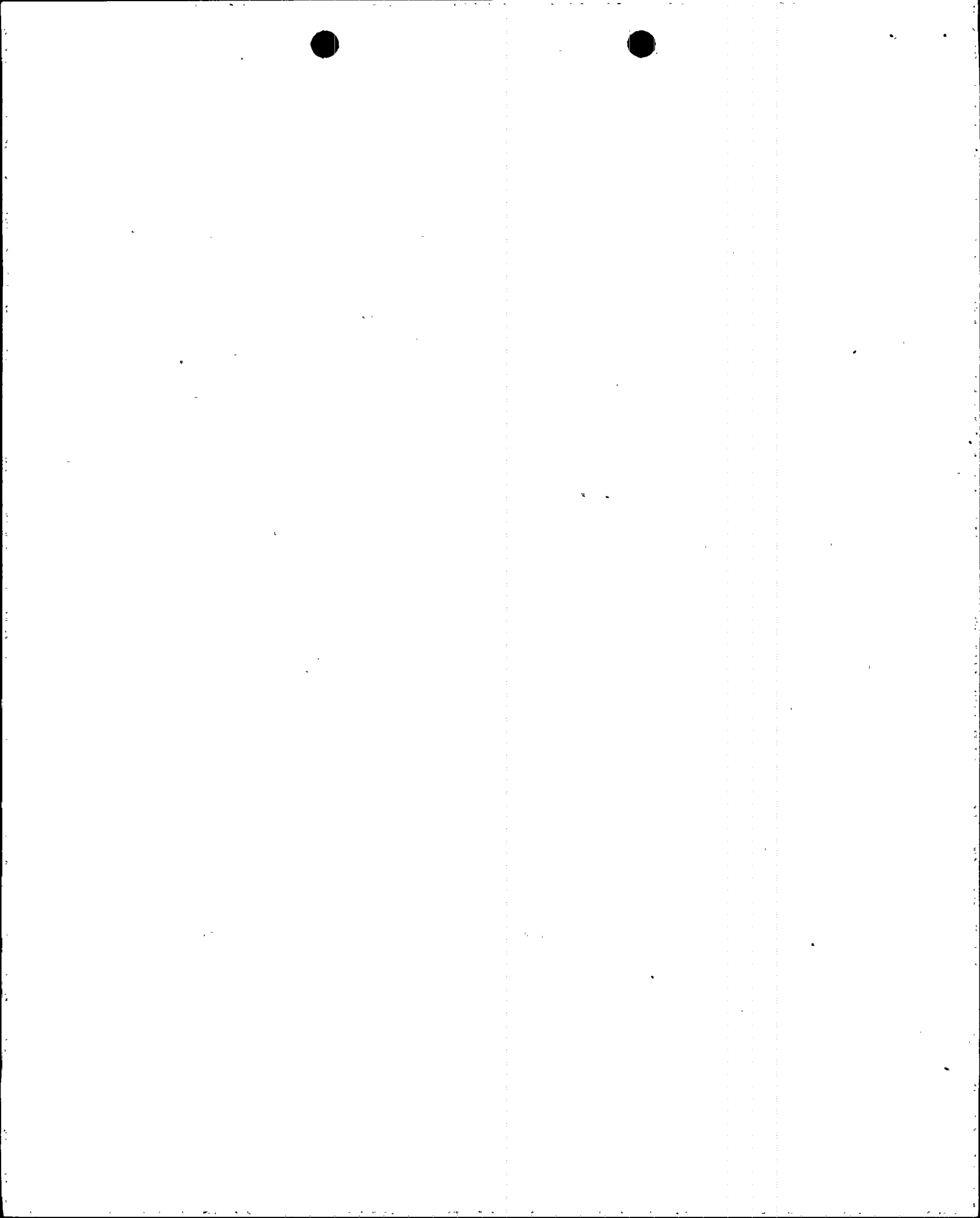
Intervenor objects to the request for an explanation on the grounds that it requests trial preparation material without the showing of substantial need for the materials required by 10 CFR § 2.740(b)(2).

3-6. 10 CFR § 20.1 C, 20.106 B, 20.201, Appendix B.

3-7. 10 CFR § 50.10 C, 1, 50.10 E 2, 50.30 F, 50.40 D, Appendix I.

3-8, 3-9, 3-10, 3-11 are inapplicable since the Licensing Board's Order of September 25, 1979.

3-12. The processing and final disposition of liquid wastes and effluents as mentioned in SGRR 3.3.6.3 and 5.2.2.4. Storage of primary coolant in SER 2.6.4.



3-13. Intervenor objects to this interrogatory. It is argumentative and calls for trial preparation material without the substantial showing required by 10 CFR § 2.740 (b)(1).

Contention 6.

6-1. a. Yes.

b. Dr. Robert Anderson. See response to interrogatory 1-1 (b).

6-2. See response to interrogatory 1-2, and 2-2.

6-3. Not determined at this time.

6-4. Not determined at this time.

6-5. The following sections of the SGRR, SER, and EIA Intervenor considers to be deficient. SGRR: 1.1.5, 1.1.7, 1.4, 3.3.4.4, 3.4, 3.4.1, 3.4.2, 3.4.6, 3.4.7, 3.4.8, 5.2.2, 6.1, 6.2.2, 8.1, 8.2, 8.3.1.1, 8.3.2.6, Table 3.4-1, Table 3.4-4, A-48-1, D-2-1. SER: 2.6.6, 2.7, 4.0. EIA: 4.1.2, 5.4, 6.0, Table 4.2.

Intervenor objects to the request for an explanation on the grounds that it requests trial preparation materials without the showing of substantial need for the materials required by 10 CFR § 2.740 (b)(2).

6-6. 10 CFR § 50.10C, 50.10E, 50.30F, 50.34A, 50.40D, Appendix I.

6-7, 6-8, 6-9, 6-10, 6-11, 6-12, and 6-13 are no longer applicable since the Licensing Board's Order of September 25, 1979.

Contention 7.

7-1. a. Yes.

b. Dr. Robert Anderson. See response to interrogatory 1-1 (b).

7-2. See response to interrogatory 1-2 and 2-2.

7-3. Not determined at this time.

7-4. Not determined at this time.

7-5. The SGRR, SER, and EIA are inadequate since in the SGRR and EIA there is no mention of installation of a Condensate Polisher Demineralizer System and the reference in the SER consists of a one sentence mention of the system with no analysis of its effects, costs, or details of the system and its installation.

Contention 9.

9-1. a. Yes.

b. Karl Z. Morgan, Arthur R. Tamplin, Walter Goldberg, and Dale Bridenbaugh. See response to interrogatory 1-1(b).

9-2. See response to 1-2 and 2-2.

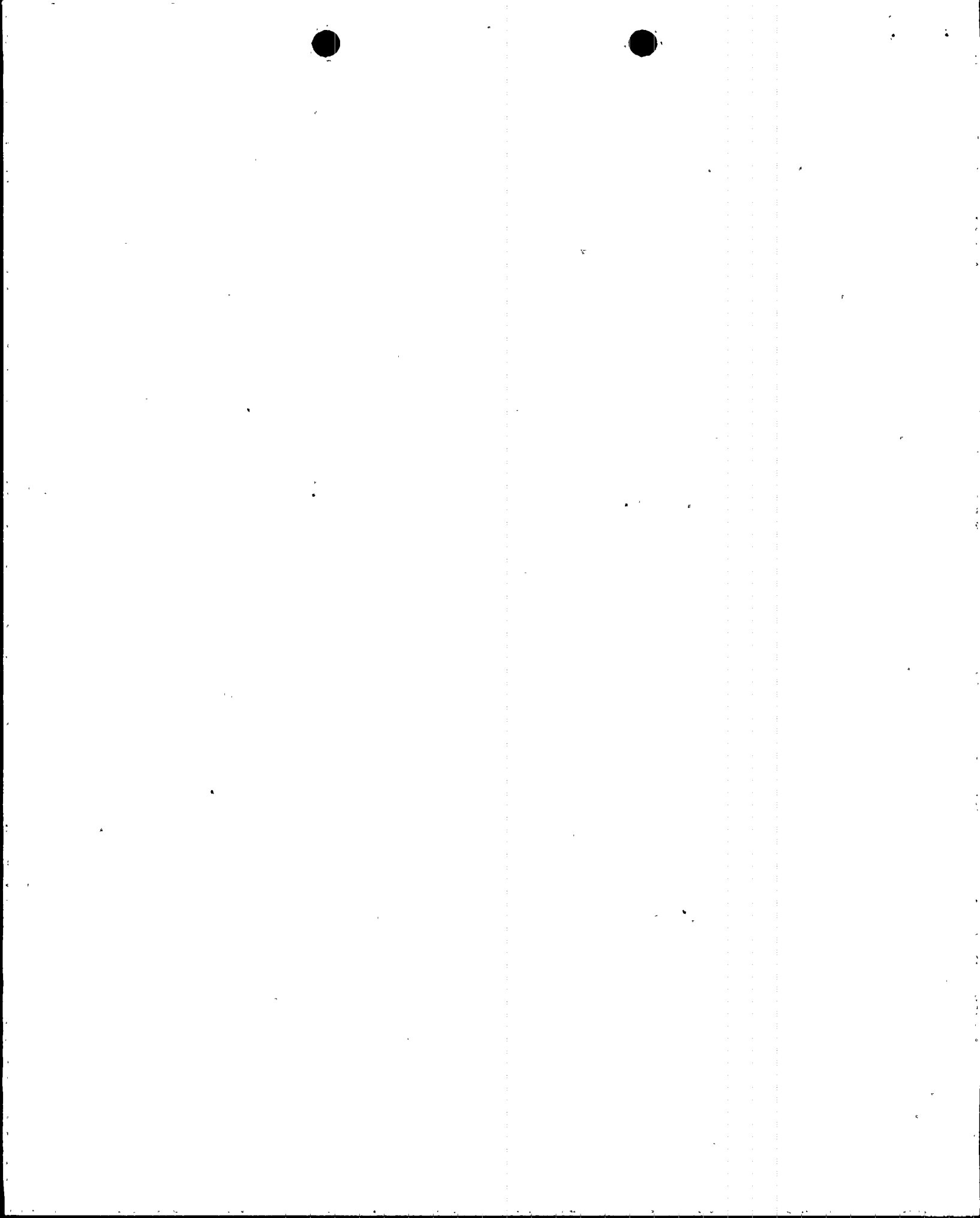
9-3. Not determined at this time.

9-4. Not determined at this time.

9-5. The following sections of the SGRR, SER, and EIA are deficient: SGRR: 1.1.5, 1.3, 3.3.4.1, 3.3.4.4, 3.3.6.3, 3.4, 3.4.1, 3.4.2, 3.4.5.4, 3.4.6, 3.4.7, 3.4.8, 5.2.2, 5.2.2.1, 5.2.2.2, 5.2.2.3, 5.2.2.4, 5.2.2.5, 6.1, 6.3.2, 6.5, 6.6.3, 8.1, 8.2, 8.3.1.1, 8.3.2.6, Table 3.4-1, Table 3.4-2, Table 3.4-4, Table 5.2-1, Table 5.2-2, Table 5.3-3, Table 5.3-4, Table 5.3-5, Table 5.3-6, Table 5.3-7, A-48-1, and D-6-1. SER: 2.6, 2.6.1.1, 2.6.1.2, 2.6.1.3, 2.6.1.4, 2.6.1.5, 2.6.2, 2.6.3, 2.6.4, 2.6.5, 2.6.6, 2.7, 4.0. EIA: 4.1.2, 5.0, 5.4, 6.0, Table 4.2.

Intervenor objects to the requirement of an explanation of why each section is deficient because it asks for trial preparation material without the showing of substantial need for the materials required by 10 CFR § 2.740 (b) (2).

9-6. The witnesses Intervenor intends to call regarding this contention have not completed their analysis of the subject matter at issue in the contention to a sufficient degree of certainty to



provide a definitive answer.

9-7 (a) 10 CFR § 20.1C, 20.106, 20.201, 20.301, Appendix B; and (b) 10 CFR § 50.34A, Appendix I.

Contention 11.

11-1. a. Yes.

b. Intervenor has no confirmed witnesses as yet.

11-2. See responses to interrogatories 1-2 and 2-2.

11-3. Not determined at this time.

11-4. Not yet determined.

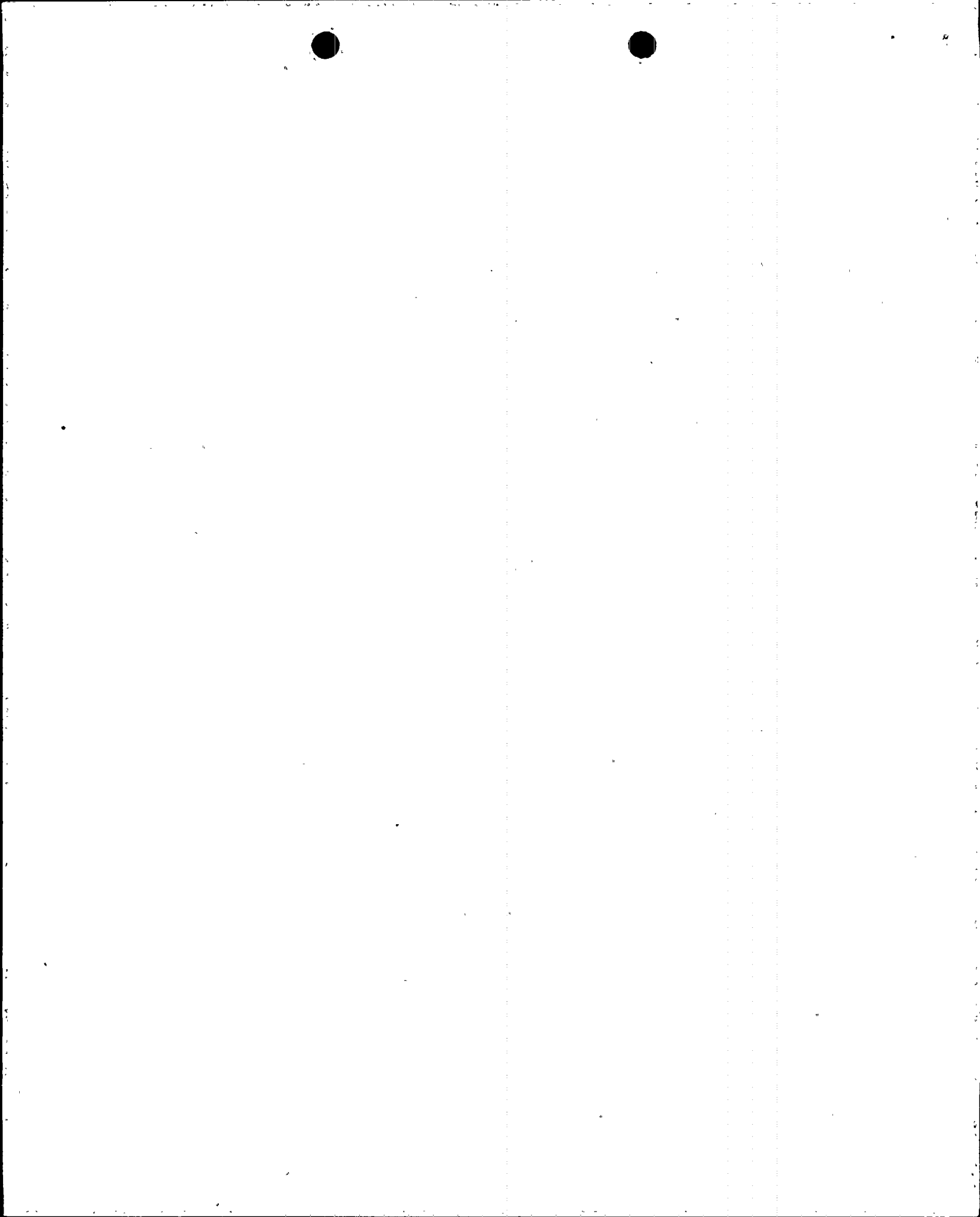
11-5. The following sections of the SGRR, SER, and EIA are deficient: SGRR: 1.1.6, 1.3, 1.4, 3.3.7.1, 3.3.7.2, 3.3.7.3, 4.0, 7.5, 7.6, 7.7, 7.8, and 7.9. The EIA: 4.2, 5.0, 6.0.

Intervenor objects to the requirement of an explanation of why each section is deficient because it ask for trial preparation materials without the showing of substantial need for the materials required by 10 CFR § 2.740(b)(2).

11-6. The estimate of \$300,000 per day per unit was published in December 1977 and has not been updated since.

11-7. Intervenor has no accurate figures on replacement power costs.

11-8. Not able to be answered at this time.



11-9. The denial of land commitment for the repair project is in the SGRR at 6.2.2.

11-10. Yes, the storage and subsequent leakage of contaminants may render the committed land unusable for an indefinite period of time involving possibly many centuries.

11-11. The environmental report and the cost benefit analysis were based on erroneous information. The decision to approve the repair project by the NRC Staff needs to be reconsidered.

11-12. No.

11-13. See 11-11.

11-14. No.

11-15. See 11-11.

Contention 13.

13-1. a. Yes.

b. Dr. Karl Z. Morgan, and Dr. Arthur R. Tamplin.
See response to interrogatory 1-1(b).

13-2. See response to interrogatory 1-2 and 2-2.

13-3. Not determined yet.

13-4. Not determined yet.

13-5. The following sections of the SGRR, SER, and EIA are

deficient: SGRR: 1.1.4, 1.1.5, 1.1.6, 3.3.4.1, 3.3.4.3, 3.3.4.4, 3.3.4.5, 3.3.5, 3.3.5.1, 3.3.5.2, 3.3.5.3, 3.3.5.4, 3.3.5.5, 3.3.6.1, 3.3.6.2, 3.3.6.3, 3.3.7.1, 3.3.7.2, 3.3.7.3, 3.4, 3.4.1, 3.4.2, 3.4.5.4, 3.4.6, 3.4.7, 3.4.8, 5.2.2, 5.2.2.1, 5.2.2.2, 5.2.2.3, 5.2.2.4, 5.2.2.5, 6.1, 6.3.2, 6.3.3, 8.1, 8.2, 8.3.1.1, 8.3.2.6, Table 3.3-2, Table 3.4-1, Table 3.4-2, Table 3.4-4, Table 5.2-4, Table 5.2-5, Table 5.2-6, Table 5.2-7, A-32-1, A-33-1, A-40-1, A-40-2, D-2-1, D-6-1. SER: 2.4, 2.5, 2.6, 2.6.1.1, 2.6.1.2, 2.6.1.3, 2.6.1.4, 2.6.1.5, 2.6.2, 2.6.3, 2.6.4, 2.6.5, 2.6.6, 2.7, and 4.0. EIA: 4.1.1, 4.1.2, 5.4, 6.0, Table 4.1, and Table 4.2.

Intervenor objects to the request to explain why each section is deficient on the grounds that it requests trial preparation material without the showing of substantial need for the materials required by 10 CFR § 2.740(b)(2).

13-6. The witnesses Intervenor intends to call regarding this contention have not completed their analysis of the subject matter at issue in the contention to a sufficient degree of certainty to provide a definitive answer.

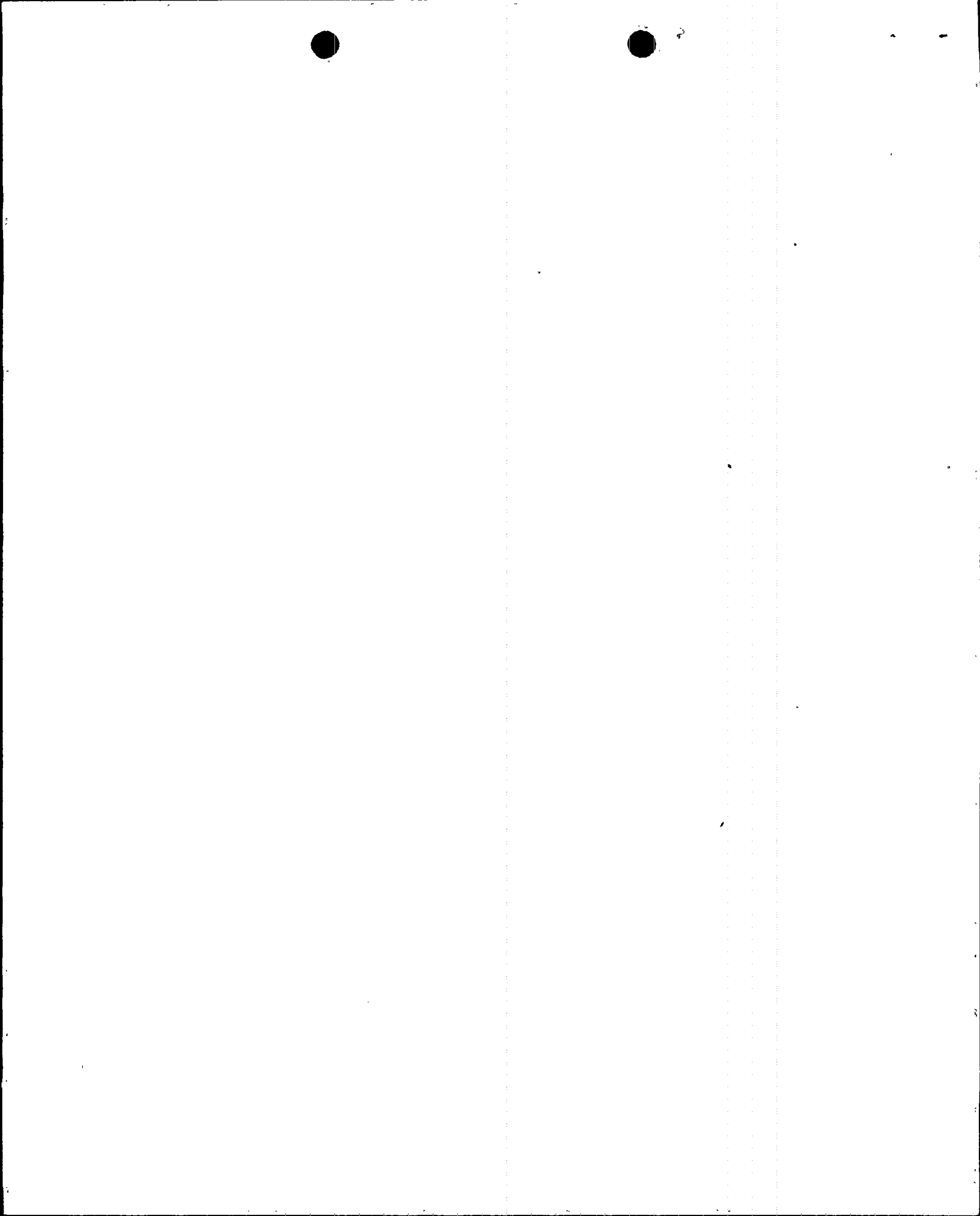
13-7. a. 10 CFR § 20.101, 20.102, 20.201, 20.202, 20.301 and Appendix B.

b. 10 CFR § 50.34 A, and Appendix I.

Contention 14.

14-1. a. Yes.

b. Intervenor has no confirmed witnesses as yet.



14-2. See response to interrogatory 1-2 and 2-2.

14-3. Not determined yet.

14-4. Not determined yet.

14-5. The following sections of the SGRR and SER are deficient:
SGRR: 1.1.6, C-4-1, C-4-2, C-4-3, C-4-4. SER: 3.2.3, and 4.0.
The EIA has no mention of radiological hazards from fire.

Intervenor objects to the requirement of an explanation of why each section is deficient because it requests trial preparation material without the showing of substantial need required by 10 CFR § 2.740 (b) (2).

14-6. Intervenor has no confirmed witnesses for this contention as yet and is unable to answer this interrogatory.

14-7. a. 10 CFR § 20.1C

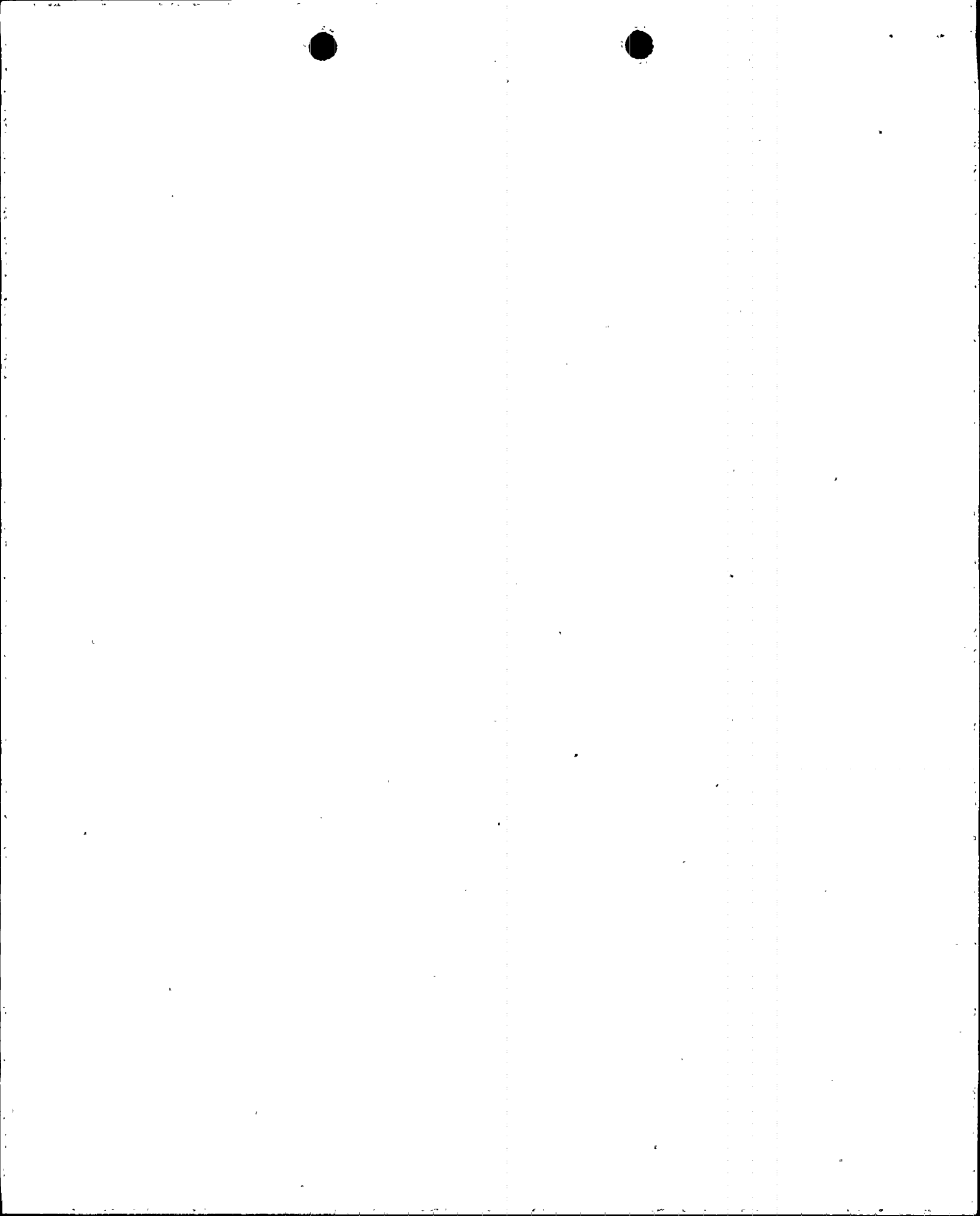
b. 10 CFR § 50.34A and Appendix I.

SWORN TO AND SUBSCRIBED BEFORE ME THIS _____ DAY OF _____, 1979.

ORIGINAL NOTARIZED.


MARK P. ONCAVAGE, Intervenor

My Commission Expires:



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos.	50-250-SP
			50-251-SP
FLORIDA POWER & LIGHT COMPANY)		
(Turkey Point Nuclear Generating)	(Proposed Amendments to	
Units Nos. 3 and 4))	Facility Operating License	
)	to Permit Steam Generator Repair)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the attached Intervenor's Answers to NRC Staff Interrogatories and Request for Production of Documents were served on the following addressees by deposit in the United States mail, express mail, properly stamped and addressed, on the date shown below.

Elizabeth S. Bowers, Esq.
Chairperson
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Washington, D.C. 20555

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On this 17th day of December, 1979. Copies of the
foregoing were hand delivered to the offices of Norman A. Coll, Esq.
on December 17, 1979

For Counsel:

By Richard A. Marshall, Jr.
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