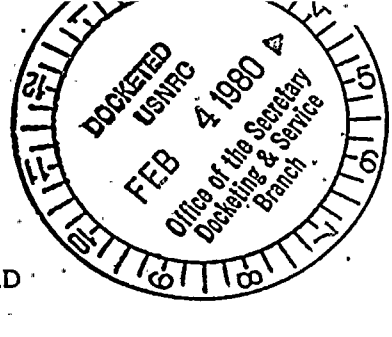
1/31/80



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	)	
	)	(Proposed Amendments to
(Turkey Point Nuclear Generating Units Nos. 3 and 4)	)	Facility Operating Licenses to Permit Steam Generator Repair)

LICENSEE'S SUPPLEMENTAL RESPONSES TO INTERVENOR MARK P. ONCAVAGE'S INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM LICENSEE, FLORIDA POWER AND LIGHT COMPANY

In accordance with its reply served January 14, 1980, Licensee herewith files supplemental responses to certain interrogatories and document requests served by Intervenor on October 27, 1979. This supplemental response also includes a revision to the previous response to Interrogatory 13-6.

Respectfully submitted,

STEEL, HECTOR & DAVIS
Co-Counsel for Licensee
14th Floor
Southeast First National Bank Bldg.
Miami, FL. 33131

By Norman A. Coll
NORMAN A. COLL

Dated: January 31, 1980

cc: See Attached Certificate of Service.

6 8002140283

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 Units Nos. 3 and 4)	)	(Proposed Amendments to Facility Operating Licenses to Permit Steam Generator Repair)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the attached Licensee's Supplemental Responses to Intervenor Mark P. Oncavage's Interrogatories to, and Request for Production of Documents from Licensee, Florida Power and Light Company, captioned in the above matter, were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below.

Elizabeth S. Bowers, Esquire
Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar Paris
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Emmeth A. Luebke
Atomic Safety and Licensing Board Panel
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Atomic Safety and Licensing Board Panel
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Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Mark P. Oncavage
12200 S. W. 110 Avenue
Miami, FL. 33176

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Miami, FL. 33131

Harold F. Reis, Esquire
Lowenstein, Newman, Reis, Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

DATED this 31st day of January, 1980

STEEL, HECTOR & DAVIS
14th Floor
Southeast First National Bank Building
Miami, FL. 33131
Telephone: (305) 577-2863

By Norman A. Coll
NORMAN A. COLL

Revisions To Previous Submittals

The Answer to Interrogatory 13-6, submitted December 17, 1979 is revised to read:

13-6 A. The primary coolant will be stored in the CVCS Holdup Tanks, or the Refueling Water Storage Tanks, or will be processed. See response to 3-1.

B. The existing Turkey Point Plant Area Radiation Monitoring System and Process Monitoring System will be employed during the repairs. See Turkey Point procedures 11100 and 11200 and FSAR Section 11.2 for the locations of the monitors. These procedures will be made available for inspection and copying, upon reasonable notice, during normal business hours.

C. All monitors listed in the above procedures will be operated continuously.

D. All monitors listed in the above procedures will provide a permanent record of radiation levels.

E. All monitors listed in the above procedures will alarm when a specific radiation level is exceeded.

F. The setpoints are listed on the attached sheets. Some of the setpoints will be changed from time to time to reflect changes in plant conditions.

13-6 F. Setpoints may vary depending on plant conditions. Actual setpoints on January 25, 1980 are listed below.

ARMS: Channel	Setpoint (mrem/hr)
1	100
2	450
3	100
4	100
5	150
6	100
7	10
8	30
9	10
10	10
11	10
12	10
13	10
14	10
15	5
16	5
17	5
18	5
19	10
20	1
21	10
22	30
23	10
24	10

PRMS: Channel	PTP3	PTP4
11	200KCPM	100KCPM
12	8KCPM	8KCPM
13	10KCPM	------
14	36KCPM	------
15	10KCPM	600CPM
17A	4.4KCPM	4KCPM
17B	4.4KCPM	7.5KCPM
18	26KCPM	------
19	25KCPM	8KCPM
20	500mrem/hr	500mrem/hr

The answers to several of the interrogatories refer to the person who contributed to the preparation of the response. The following were generally responsible for managing the preparation of the responses to the interrogatories:

S. G. Brain	FPL - 9250 W. Flagler St., Miami, Florida
M. David	Bechtel - 15740 Shady Grove Rd., Gaithersburg, Md.
F. M. Gavila	FPL - 9250 W. Flagler St., Miami, Florida
J. Hurd	Bechtel - 15740 Shady Grove Rd., Gaithersburg, Md.
H. D. Mantz	FPL - 9250 W. Flagler St., Miami, Florida
H. Story	FPL - 9250 W. Flagler St., Miami, Florida
G. D. Whittier	FPL - 9250 W. Flagler St., Miami, Florida
T. Young	FPL - 9250 W. Flagler St., Miami, Florida

A. The answers to the interrogatories generally refer to any documents upon which the answer was based. Documents of general applicability include the following:

1.) Steam Generator Repair Report (SGRR)

2.) Turkey Point Plant Final Safety Analysis Report (FSAR)

3.) Florida Power & Light Company Health Physics Manual

4.) Turkey Point Plant Procedures

E. FPL has not at this time identified the persons whom FPL intends to have testify as expert witnesses. When it does so, FPL will provide the intervenor with the requested information.

F. See answer to interrogatory E. FPL will provide the information when it is available.

G. FPL has not yet identified the documents that it intends to employ in presenting a direct case on the subject matter of this proceeding. When it does so, it will provide intervenor with a list of the documents and,

to the extent they have not been previously made available, will make them available for inspection. FPL directs intervenor to its answers to these interrogatories generally for references to various documents used by FPL to answer these interrogatories. For documents that FPL will "rely upon", instead of introduce into evidence, FPL cannot say at this time what documents will be used by any witness. To the extent that it can be done, prepared written testimony of FPL witnesses will contain references to documentary sources.

1-4 The replacement steam generator lower assemblies were ordered on April 17, 1977.

1-5 See response to 1-4. The first three steam generator lower assemblies were delivered on site in June, 1979. The last three are scheduled for delivery early in 1980. Between the original order date and the shipment dates, the lower assemblies were in various stages of design, fabrication, and construction.

1-6 In FPL's opinion, the steam generator assemblies incorporate the most recent improvements in steam generator design. Section 2 of the SGRR provides information on the replacement component design.

1-7 See answer to interrogatory 1-8. FPL believes that the repaired steam generators will provide increased operating reliability and improved resistance to corrosion of the secondary side thereby minimizing the potential for future repairs. See SGRR Section 2.2

1-8 Based on FPL's current understanding of potential corrosion mechanisms within a steam generator, FPL does not expect any material tube degradation upon return to operation with the repaired steam generators.

1-9 No. FPL does not expect that any phosphates would remain in either the steam generator or the feed and condensate system following replacement of the steam generator lower assemblies:

A. The phosphates were removed from the feed and condensate system by the flushing of the system during operation following cessation of the phosphate treatment. Any residual phosphates left in the steam generator will be removed by replacing the lower assemblies.

B. Not applicable.

1-10 FPL will maintain coolant chemistry within the new steam generator assemblies in accordance with the Turkey Point Plant approved chemistry specifications in effect at the time the new assemblies are placed into operation. FPL's chemistry specifications are continuously being reviewed by plant and technical support personnel to assure state of the art. FPL does not know at this time what precise specifications will be in effect following the steam generator repair.

1-12 An analysis of the cost effectiveness of primary side surface decontamination of the defective steam generators is provided in SGRR Section 7.6, work areas and local decontamination in SGRR Section 3.3.5.2 and question A-40.

1-14 The Board has ordered FPL to provide information either in a revision to the SGRR or in testimony concerning the tests that are planned to assure containment building and reactor coolant system integrity following the repair. FPL will provide this information to the Board and the parties when it is available.

1-18 Local decontamination procedures are routinely successfully employed at Turkey Point for various equipment, structures, and system components. The decontamination procedures are usually performed or supervised by Health Physics Technicians. Health Physics Technicians have received extensive training and experience in radiation protection. They are hired by Florida Power & Light Company based on their training and experience without regard to race, geographic origin, or sex. They must be at least 18 years of age.

1-19 In the event of a hurricane during or subsequent to the steam generator repair, Turkey Point Plant Emergency Procedure 20106, National Emergencies, and the site Emergency Plan would be followed to secure the site to minimize the impact of the hurricane on the plant, our workers, and members of the public. FPL will make a copy of the procedure and the plan available for inspection and copying, upon reasonable notice, during normal business hours.

1-20 See response to 1-19. See also answers to interrogatories under contention 6.

1-22 In the event that temporary onsite storage of the steam generator lower assemblies which are removed from containment is not possible, then the lower assemblies would either be cut up or left whole and shipped offsite to a licensed burial site for permanent disposal.

A. SGRR Section 8.3.2.6 provides this information to the extent known.

B. The exact time has not been determined. The estimated time would be less than six months.

C. SGRR Section 8.3.2.6 provides this information to the extent known.

D. Not determined.

E. Not determined -- It would likely be by truck or barge.

1-29 FPL owns no decommissioned fossil fuel plants. FPL has fossil fuel plants in extended cold standby status. There are no plans to place these units in service during the steam generator repair outage.

1-30 Estimated capital costs for steam generator repair for two units follow (1979 dollars)

Cost of Steam Generator Equipment	$ 25,000,000
Engineer Cost	5,200,000
Field Costs	58,300,000
Power Resources Costs	3,200,000
FPL Support Costs	4,300,000
Construction & Engineering Fees	2,400,000
Allowance for Funds Used During Construction	11,000,000
Contingency	9,900,000
	$119,300,000

See response 7-7. Total cost of the condensate polishing system including installation for Turkey Point Units 3 & 4 is $9.1 million (in 1979 dollars).

2-14 There are no detailed calculations made in determining the 100 man-rem. This estimate was based on previous FPL and Westinghouse experience and engineering judgement.

Based on actual experience at Turkey Point, eddy current examination and sludge lancing on 3 steam generators during the 1977 refueling of Turkey Point Unit #4 resulted in 48 man-rem exposure. This included examination and gaging (to define the degree of denting) of approximately 2600 tubes in a steam generator channel head radiation field of 100 millirem/minute. Information provided by Westinghouse in October 1977 indicated that a recent eddy current and sludge lancing program at a four loop plant (Zion which has similar radiation fields to Turkey Point Unit #3) resulted in 25 man-rem. This included examination of approximately 2300 tubes in a 325 millirem per minute channel head radiation field.

Based on the above it is estimated that post-repair dose for steam generator inspection and repair will be 25 to 50 man-rem per unit. Thus use of 100 man-rem for both units is considered appropriate.

2-15 See response to interrogatories 1-6 through 1-8.

2-16 The man-rem doses incurred for steam generator inspections and plugging operations were not recorded separately from other maintenance operations in the years 1974 through 1977. Estimates were developed for 1976 which are shown in SGRR Section 3.3.7.1. The recorded man-rem doses for steam generator inspection and repair in 1978 were 253. The recorded man-rem doses for steam generator inspection and repair in 1979 were 416.

2-19 Florida Power & Light Company does not allow persons under the age of eighteen or pregnant women to work in areas where they could be exposed to ionizing

radiation. These general policies will be applicable to the steam generator repair. FPL does not allow any person to exceed the 5(N-18) ionizing radiation exposure limit in 10 CFR 20. The 5(N-18) limit results in lower exposure limits for younger persons than for older persons.

2-31 FPL expects that the steam generator upper assemblies will satisfactorily mate with the new lower assemblies. However, if during the repair project, it is determined that an upper assembly does not mate with the corresponding lower assembly within allowable tolerances, the condition would be reviewed by appropriate engineering personnel who would analyze the situation, evaluate its significance, and formulate any required corrective action. Such corrective action would be formalized into procedures, which would be reviewed and approved by appropriate personnel including health physics personnel and then implemented by construction personnel to remedy the condition.

3-20 The tanks used to store reactor coolant during the repair will be the CVCS Holdup Tanks or the Refueling Water Storage Tanks. The following information is provided for the Refueling Water Storage Tanks:

A. The Unit 3 tank is located east of the Unit 3 containment and west of the Unit 3 & 4 intake structure. The Unit 4 tank is located east of the Unit 4 containment and south of the Unit 3 tank.

B. See FSAR Table 6.2-6.

C. See FSAR Table 6.2-6.

D. Not available.

E. No additional biological shielding is provided or required.

The following information is provided for the CVCS Holdup Tanks:

A. The tanks are located immediately south of the Unit 3

containment.

B. See FSAR Table 9.2-3.

C. Stainless Steel.

D. Not available.

E. The tanks are located inside adjoining cubicles which have concrete walls, floors, and ceilings.

See response to 13-6 A.

3-21 The radiation intensity on the surface of the Refueling Water Storage Tanks has an average value of one to five millirem/hour and a maximum value of 10 millirem/hour. The radiation intensity on the surface of the CVCS Holdup Tanks has an average value of ten to twenty millirem/hour and a maximum value of 30 millirem/hour.

3-28 Not applicable.

6-20 A. Cranes will be used to lift the lower assemblies off the transporter.

B. Cranes will be used to position the lower assemblies in the storage facility.

C. The roof will not be installed until the lower assemblies are positioned in the storage facility.

6-27 An analysis to determine the effect that a postulated drop of a lower assembly off a transporter would have on the seal weld plates has not been performed. The potential for overturning a loaded trailer is addressed in SGRR Section 5.2.1.1.

6-30 FPL has no plans to store other radioactive material in addition to the lower assemblies in the storage facility.

6-31 FPL has no plans to store other radioactive material in the storage facility after the lower assemblies have been removed.

6-32 A specific date for removing the steam generator storage facility from the Turkey Point site has not been determined. See response to interrogatory 11-9.

6-33 Information concerning hurricanes striking the southeast Florida coast is available in Section 2.6.6 of the FSAR and in published sources, such as Simpson, R.H. and Lawrence, M.B., Atlantic Hurricane Frequencies Along the U. S. Coastline, NOAA Tech. Memo NWS-SR-58, U. S. Department of Commerce, NOAA, NWS, Southern Region, Ft. Worth, Texas, June, 1971.

7-2 The planned condensate polishing demineralizer system will be manufactured by:

Ecodyne Corporation
Graver Water Division
2720 U. S. Highway #22
Union, New Jersey 07083

7-3 See response to 1-30.

7-4 The system will be installed by Florida Power & Light Company and Bechtel Corporation.

7-11 It is presently estimated that there will be no environmental degradation caused by the effluent release as a result of the operation of a full flow condensate polishing demineralizer system. The water quality of the polishing demineralizer system effluent discharge is expected to be superior to the water quality of the cooling canal system, Biscayne Bay, or Card Sound. FPL

will provide the intervenor with a copy of its response to the NRC staff letter to Dr. Robert Uhrig of November 19, 1979.

7-12 Comparisons of water quality characteristics of Biscayne Bay water, cooling canal water and Card Sound water were made under the supervision of Frank Gavila of 9250 West Flagler, Miami, Florida and Drs. Josko Jerkunica, Royce Bramlett, and Edgar Lowe of Applied Biology, 641 DeKalb Industrial Way, Decatur, Georgia 30033.

7-16 The proposed location of the condensate demineralizers is just west of Units 3 & 4, near the Units 3 & 4 discharge facility. (A definition of "support equipment" is needed to complete a response to this interrogatory.)

7-18 There is no facility planned to house the condensate polishing demineralizer. (The term "new support equipment" is not sufficiently defined for FPL to frame an answer).

7-23 As requested in the intervenor's response of December 17, 1979, FPL will provide the intervenor with a copy of its response to NRC Staff letter to Dr. Robert E. Uhrig dated November 19, 1979.

7-24 -- 7-27 See response to 7-23.

9-1 The below listed procedures are used for monitoring surveillance, measurements, and testing in the radiological environmental monitoring program:

Procedure Title	Procedure Number
Quality Control Procedure for Collection, Identification, and Reporting of Intralaboratory Quality Control	A
Quality Control Procedure for Analysis and Reporting of Interlaboratory Quality Control	B
Sampling Procedure for Air Sampling	I

Procedure Title	Procedure Number
Sampling Procedure for Biota Sampling	II
Sampling Procedure for Gamma Background	III
Sampling Procedure for Water and Precipitation	IV
Sampling Procedure for Vegetation	V
Sampling Procedure for Food Crops	VI
Sampling Procedure for Silt	VII
Sampling Procedure for Soil	VIII
Sampling Procedure for Algae	IX

Procedure Title	Procedure Number
Sampling Procedure for Milk	X
Sampling Procedure for Collecting and Identifying Samples for Intralaboratory Quality Control Program	XI
Sampling Procedure for Annual Garden Census	XII
Sampling Procedure for Milk-Semi-annual Dairy Animal Census	XIII
Calibration of Thermoluminescent Dosimeters	1
Calibration of Nuclear-Chicago Proportional Counter	2
Calibration of Hewlett-Packard Gamma Analyzer	3
Calibration of Packard Tri-Carb Liquid Scintillation Spectrometer	4
Calibration of Rockwell Gas Meters	7
Calibration of Ion Chambers	8

9-1 A. These procedures will be made available for inspection and copying, upon reasonable notice, during normal business hours.

B. See Turkey Point Technical Specifications Table 4.12-1.

C. The procedures are utilized at periodic intervals as required by Table 4.12-1 of the Turkey Point Technical Specifications.

D. See Turkey Point Technical Specifications Table 4.12-1 and Figure 4.12-1 for sampling locations. The analyses are performed, except for the I-131 milk analyses, in the Radiological Health Regional Laboratory, Orlando, Florida. The I-131 milk analysis is performed in West Chicago, Illinois.

E. The radiological environmental monitoring program for Turkey Point is conducted by the State of Florida, Department of Health and Rehabilitative Services, Central Operations Radiological Health branch.

(1) The director of the Central Operations Radiological Health, Surveillance, and Laboratories Section (which performs the

sampling and analyses) is Mr. W. Johnson, Radiological Health, Orlando, Regional Laboratory, Orlando, Florida.

Eberline Instrument Corporation, Midwest Facility
245 Roosevelt Road, West Chicago, Illinois 60185
performs I-131 analyses of milk.

(2) There is no contract governing the radiological environmental monitoring program. The program is performed by the State of Florida pursuant to a grant agreement with FPL.

F. The reports containing the test results of all environmental radiological sampling and analyses done since Turkey Point Units 3 & 4 began operations will be made available for inspection and copying, upon reasonable notice, during normal business hours.

9-2 There are no residual concentrations which have been measured in the environment surrounding the Turkey Point site which resulted from liquid or gaseous waste releases from Turkey Point.

The results of the sample analyses of the radiological environmental monitoring program are reported to the NRC semi-annually within 60 days following January 1st and 60 days following July 1st covering the previous six months of operation. These reports are available in the Local Public Document Room, or will be made available for inspection and copying, upon reasonable notice, during normal business hours.

9-3 A. No.

B. No.

C. No.

D. No.

E. No.

F. No.

G. No.

H. Yes, except for G.

I. Not applicable.

9-6 See response to interrogatory 6-28.

A. See response to interrogatory 6-28.

B. The amount of radioactivity that could be removed from the reactor coolant side of a steam generator lower assembly would be dependent on surface accessability; the removal process selected, process efficiency per unit time and process operating duration.

C. See response to interrogatory 6-28.

9-7 Radioactive material removed from the steam generator lower assemblies will be solidified if required and disposed of off-site in a licensed low-level waste burial facility.

9-8 See response to 9-6 and 6-28.

9-12 The nature of groundwater in the vicinity of Turkey Point is discussed in the Turkey Point Plant Final Safety Analysis Report in Section 2.10.

11-5 A. Based upon the current schedule, the steam generator repair outage will last 217 days.

B. The Critical Path Network Method was used to determine the outage time.

C. The scheduling activities were coordinated by Mr. M. Athanasiou, Senior Analyst, Florida Power & Light Company, P. O. Box 529100, Miami, Fla. 33152.

11-9 The length of time that the planned building housing the steam generator

lower assemblies will remain onsite has not been determined. See response to interrogatory 6-32.

11-10 The cost of the planned steam generator lower assembly storage building is estimated to be $2.6 million (1979 dollars).

11-11 FPL does not have any estimates on what the steam generator lower assembly storage facility will cost to dismantle.

11-12 No. See answer to interrogatory 11-11.

11-19 Timet Division
Titanium Metal Corporation of America
P. O. Box 2824
Pittsburg, Pa. 15230

Trent Tube Division
East Troy, Wisconsin 53120

13-5 Records of individual cumulative exposures will be maintained in accordance with Turkey Point procedures 11500 and 11550.30, 11550.31 and 11550.102. These procedures will be made available for inspection and copying, upon reasonable notice, during normal business hours.

13-6 G. The below listed persons supervise radiation monitoring operations or
H. have knowledge of radiation monitoring procedures during the repairs:

P. W. Hughes, Health Physics Supervisor, Turkey Point Plant

J. S. Wade, Chemistry Supervisor, Turkey Point Plant

E. R. LaPierre, Radiochemist, Turkey Point Plant

H. F. Story, Health Physicist, 9250 West Flagler, Miami, Florida

13-7 A. FPL does not now intend to discharge the primary coolant. If FPL
F. decides to discharge the primary coolant, FPL will sample the coolant prior to discharge. If the activity is approximately equal to or less than 10^{-5} µc/ml the coolant could be discharged; otherwise, the coolant would be returned to the plant's radwaste system for further processing.

For storing and processing primary coolant, see response to interrogatory 13-6.

G. See response to 13-6 (G & H)
H.

13-8 G. See response to 13-6 (G & H)
H.

13-9 G. See response to 13-6 (G & H)
H.

13-10 G. See response to 13-6 (G & H)
H.

13-11 G. See response to 13-6 (G & H)
H.

13-12 G. See response to 13-6 (G & H)
H.

13-13 G. See response to 13-6 (G & H)
H.

13-14 G. See response to 13-6 (G & H)
H.

13-15 G. See response to 13-6 (G & H)
H.

13-16 G. See response to 13-6 (G & H)
H.

13-17 G. See response to 13-6 (G & H)
H.

13-18 A. - F. See response to interrogatory 13-13.

13-18 G. See response to 13-6 (G & H)
H.

14-8. The material to be used for the envelopes has not been determined. Griffolyn Type 55 FR and Herculite "Austenitic" I, II, and III are typical of materials under consideration.

A. -- E. Not known.

F. The material used for the envelope is not expected to burn and

therefore there would be no potential danger to the workers.

G. No special procedures exist for ingress and egress.

H. No.

14-10 The envelopes are vented to the containment building through a high efficiency particulate air (HEPA) filter. See response to interrogatory 13-17.

14-11 A. The containment is vented through the containment purge exhaust system.

B. See response to interrogatory 13-13.

14-13 FPL does not know the flashpoint.

14-14 FPL does not know the flashpoint.

14-20 No special suits beyond the protective clothing normally used for fighting fires (e.g., coats, hats, boots, gloves, breathing apparatus) are used for fighting fires containing radioactivity at Turkey Point. Normal clothing used for fighting fires are adequate for fighting fires containing radioactivity.

A. Not applicable.

B. Not applicable.

14-21 Local fire chiefs are encouraged to visit and tour Turkey Point at least once a year. Metro Dade County Fire Department representatives last visited Turkey Point on August 6, 1979.

Representatives from the Homestead AFB Fire Department last visited Turkey Point on July 10, 1978.

14-22 FPL has given the local fire chiefs no written information. Instead, the local fire chiefs have received oral briefings concerning what to expect in fighting fire at Turkey Point.

14-23. No. See response to interrogatory 14-24.

14-24 Turkey Point Emergency Procedure 20107 will be utilized. This procedure will be made available for inspection and copying, upon reasonable notice, during normal working hours.

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	)	
	)	(Proposed Amendments to
(Turkey Point Nuclear Generating	)	Facility Operating License
Units Nos. 3 and 4	)	to Permit Steam Generator
	)	Repair)
	)	

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

G. D. Whittier, being first duly sworn, deposes and says:

I am Supervising Engineer for the Nuclear Licensing Department of Florida Power & Light Company. The answers to Discovery Requests attached were prepared under my supervision, are true and correct to the best of my knowledge, information and belief, and I have been authorized to sign this document on behalf of Florida Power & Light Company this 31st day of January, 1980.

FLORIDA POWER & LIGHT COMPANY

By G D Whittier
G. D. Whittier
Supervising Engineer

Subscribed and sworn to before me this

31st day of January, 1980

Lois I. Marino
NOTARY PUBLIC, in and for the County of Dade,
State of Florida

NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION EXPIRES AUGUST 24, 1981
BONDED THRU MAYNARD BONDING AGENCY

My commission expires: _____