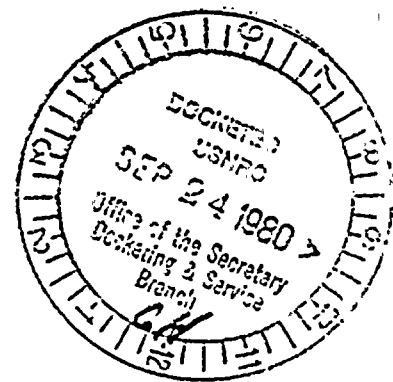


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Atomic Safety and Licensing Board

Elizabeth S. Bowers, Chairman
Dr. Emmeth A. Luebke, Member
Dr. Oscar H. Paris, Member



In the Matter of

FLORIDA POWER & LIGHT COMPANY

Docket Nos. 50-250-SP
50-251-SP

(Turkey Point Nuclear Generating
Unit Nos. 3 and 4)

MOTION FOR LEAVE TO PARTICIPATE
PURSUANT TO RULE 2.715(c)
OF THE UNITED STATES
NUCLEAR REGULATORY COMMISSION
RULES AND REGULATIONS,
RULES OF PRACTICE FOR
DOMESTIC LICENSING PROCEEDINGS

Petitioner, METROPOLITAN DADE COUNTY, a political subdivision of the State of Florida, by and through its undersigned counsel, hereby files this Motion for Leave to Participate Pursuant to Rule 2.715(c) before this Honorable Board, and alleges as grounds therefor, the following:

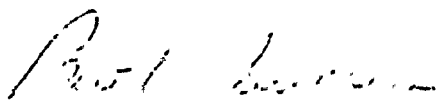
1. On September 2, 1980, the Board of County Commissioners of Dade County unanimously adopted a resolution directing the County Attorney's Office to petition the Atomic Safety and Licensing Board for leave to participate pursuant to Rule 2.715(c), said resolution being attached hereto and made a part hereof.

2. Rule 2.715(c) provides in pertinent part that an agency such as Dade County shall have a "a reasonable opportunity to participate and to introduce evidence, interrogate witnesses, and advise the commission without requiring the representative to take a position with respect to the issue. Such participants may also file proposed findings and exceptions pursuant to Sections 2.754 and 2.762 and petitions for review by the commission pursuant to Section 2.786".

3. Review of the Environmental Impact Appraisal by the Office of Nuclear Reactor Regulation and the Safety Evaluation by the Office of Nuclear Reactor Regulation, and amendments thereto, and review of the Environmental Impact Statement is likely to reveal areas of unique concern to petitioner. Petitioner would reserve its right to raise issues upon review of said documents.

WHEREFORE, your Petitioner, METROPOLITAN DADE COUNTY, respectfully requests that this Board permit petitioner to participate in all hearings in reference to the repairs at the Turkey Point Nuclear Generating Unit Nos. 3 and 4, as provided in Rules of Practice for Domestic Licensing Proceedings, 2.715(c).

ROBERT A. GINSBURG
Dade County Attorney
1626 Dade County Courthouse
Miami, Florida 33130

BY: 
Burt L. Saunders
Assistant County Attorney

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

FLORIDA POWER AND LIGHT COMPANY)

(Turkey Point, Units 3 and 4))
)
)
)
)
)

Docket No.(s) 50-250SP
50-251SP

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Dated at Washington, D.C. this

24th day of SEPT 1980.

Peggy T. Sawring
Office of the Secretary of the Commission

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

FLORIDA POWER AND LIGHT COMPANY)

(Turkey Point, Units 3 and 4))
)
)
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)

Docket No.(s) 50-250SP
50-251SP

SERVICE LIST

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

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

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

Counsel for NRC Staff
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Florida Power and Light Company
ATTN: Dr. Robert E. Uhlig
Vice President
P.O. Box 529100
Miami, Florida 33152

Michael A. Bauser, Esq.
Lowenstein, Newman, Reis, Axelrad & Toll
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

Mr. Mark P. Oncavage
12200 Southwest 110th Avenue
Miami, Florida 33176

Norman A. Coll, Esq.
Steel, Hector and Davis
1400 S.E. First National Bank Building
Miami, Florida 33131

Neil Chonin, Esq.
Law Offices of Neil Chonin, P.A.
New World Tower Bldg., 30th Floor
100 North Biscayne Boulevard
Miami, Florida 33132

Henry H. Harnage, Esq.
Peninsula Federal Bldg., 10th Floor
200 S.E. First Street
Miami, Florida 33131

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

September 24, 1980

Docket No. 50-250
50-251

SEE ATTACHED LIST

Subject: FLORIDA POWER AND LIGHT CO.
Turkey Point Plant Units 3 and 4

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Docket Files 50-250
50-251

ORB1 Reading
CSParrish
MGrotenhuis

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- ☐ Amendment No. _____ to CPPR- _____ or DRR- _____, dated _____.
- ☒ Other: Monthly operating reports for December 1979.
- ☒ (8005200544).

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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OFFICE ▶

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cc: Chief
Division of Ecological Services
Bureau of Sport Fisheries & Wildlife
U. S. Department of the Interior
Washington, D. C. 20240

Director
National Oceanographic Data Center
Environmental Data Service
National Oceanic & Atmospheric Administration
U. S. Department of Commerce
Washington, D. C. 20235

Dr. James T. Tanner
National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

Director
Technical Assessment Division
Office of Radiation Programs (AW-459)
U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

U. S. Environmental Protection Agency
Region IV Office
ATTN: EIS COORDINATOR
345 Courtland Street, N.E.
Atlanta, Georgia 30308

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WASHINGTON D.C. 20555

September 24, 1980

Docket No. 50-250
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- ☒ Other: Monthly operating reports for September 1979.
- ☒ (8005200392).

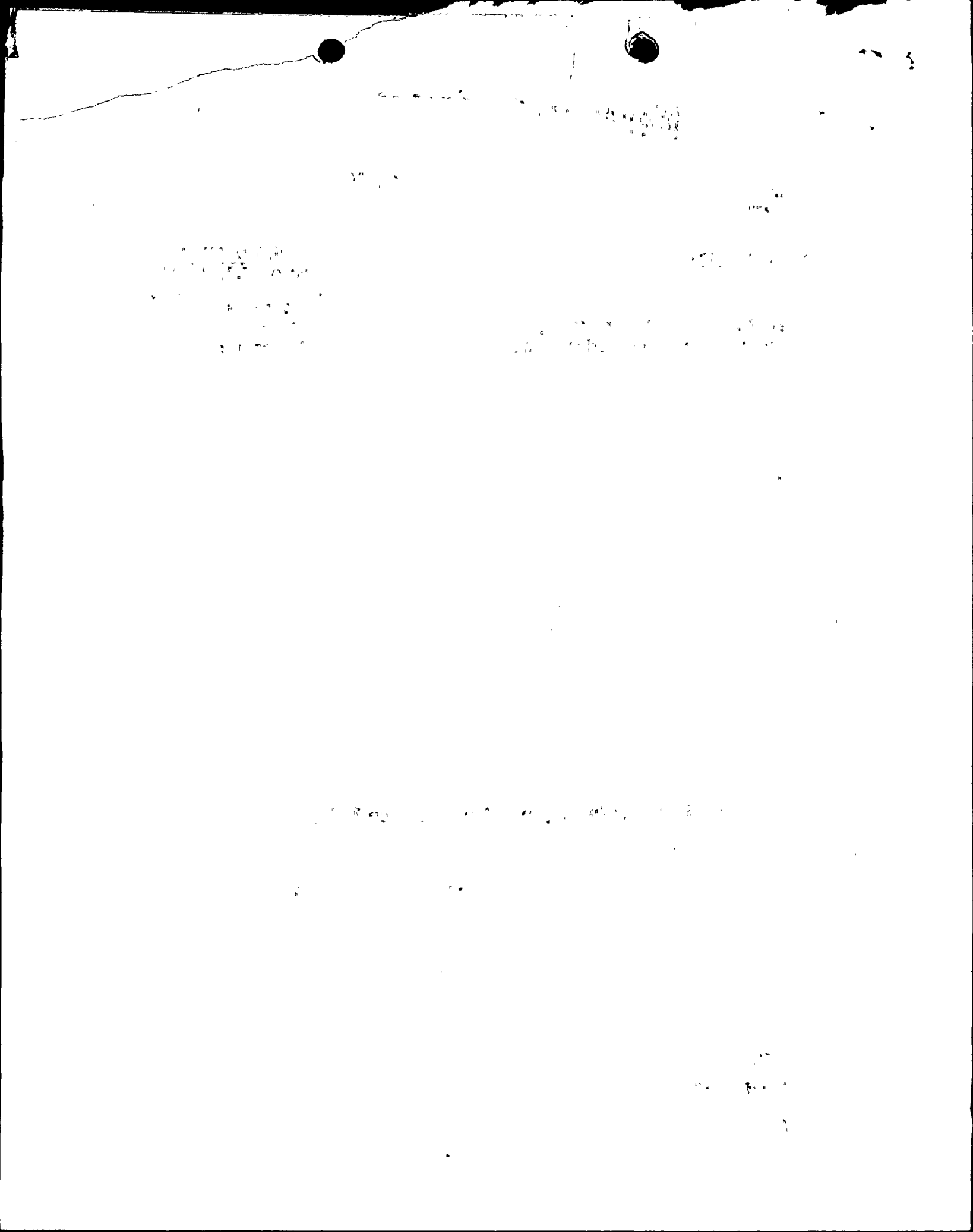
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NUCLEAR REGULATORY COMMISSION
WASHINGTON D.C. 20555

September 23, 1980

Docket No. 50-250
50-251

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Subject: FLORIDA POWER AND LIGHT CO.
Turkey Point Plant Units 3 and 4

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- ☒ Other: Monthly operating reports for October 1979.
- ☒ (8005200595).

Division of Licensing
Office of Nuclear Reactor Regulation

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DATE	9/ /80					

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Washington, D. C. 20234

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Crystal Mall #2
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NUCLEAR REGULATORY COMMISSION
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September 23, 1980

Docket No. 50-250
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Subject: **FLORIDA POWER AND LIGHT CO.**
Turkey Point 3 and 4

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- ☒ Other: Monthly operating reports for March 1979.
- ☒ (8005200688).

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Office of Nuclear Reactor Regulation

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Bureau of Sport Fisheries & Wildlife
U. S. Department of the Interior
Washington, D. C. 20240

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Washington, D. C. 20235

Dr. James T. Tanner
National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

Director
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Office of Radiation Programs (AW-459)
U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

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September 23, 1980

Docket No. 50-250
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Turkey Point 2 3 and 4

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- ☒ Other: Monthly operating reports for October 1980.
- ☒ (8005200595).

Division of Licensing
Office of Nuclear Reactor Regulation

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Washington, D. C. 20235

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National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

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U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

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Subject: **FLORIDA POWER AND LIGHT CO.**
Turkey Point Plant Units 3 and 4

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- ☒ Other: Monthly ~~KA~~ operating reports for February 1979.
- ☒ (8005200480).

Division of Licensing
Office of Nuclear Reactor Regulation

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Handwritten initials/signature

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DATE ▶	9/ /80					

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cc: Chief
Division of Ecological Services
Bureau of Sport Fisheries & Wildlife
U. S. Department of the Interior
Washington, D. C. 20240

Director
National Oceanographic Data Center
Environmental Data Service
National Oceanic & Atmospheric Administration
U. S. Department of Commerce
Washington, D. C. 20235

Dr. James T. Tanner
National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

Director
Technical Assessment Division
Office of Radiation Programs (AW-459)
U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

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September 23, 1980

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Turkey Point Plant 3 and 4

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- ☒ Other: Monthly operating reports for July 1980.
- ☒ (8008180389).

Division of Licensing
Office of Nuclear Reactor Regulation

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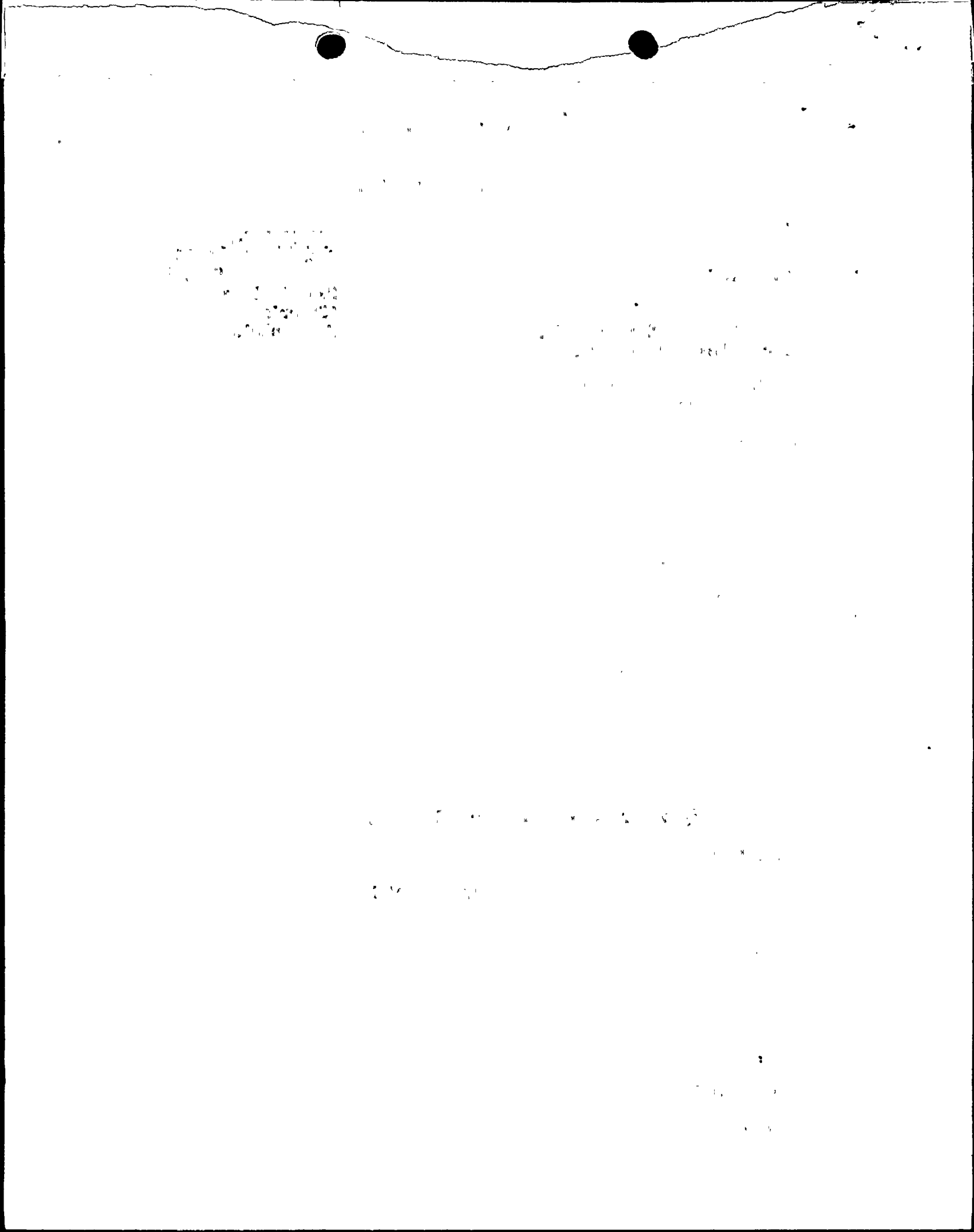
DL:ORB1

SURNAME

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cc: Chief
Division of Ecological Services
Bureau of Sport Fisheries & Wildlife
U. S. Department of the Interior
Washington, D. C. 20240

Director
National Oceanographic Data Center
Environmental Data Service
National Oceanic & Atmospheric Administration
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National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

Director
Technical Assessment Division
Office of Radiation Programs (AW-459)
U. S. Environmental Protection Agency
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON D.C. 20555

September 23, 1980

Docket No. 50-250
50-251

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Turkey Point Plant Units 3 and 4

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- ☒ Other: Monthly operating reports for January 1979.
- ☒ (8005200633).

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:
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DATE ▶	9/ /80					

cc: Chief
Division of Ecological Services
Bureau of Sport Fisheries & Wildlife
U. S. Department of the Interior
Washington, D. C. 20240

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National Oceanographic Data Center
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National Oceanic & Atmospheric Administration
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National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
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Turkey Point Unit 3 and 4

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- ☒ Other: Monthly operating reports for August 1979,
- ☒ (8005200581).

Division of Licensing
Office of Nuclear Reactor Regulation

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SURNAME	CSParrish;cf				
DATE	9/ /80				

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Division of Ecological Services
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- ☒ (8005200557).

Division of Licensing
Office of Nuclear Reactor Regulation

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Subject: FLORIDA POWER AND LIGHT CO.
Turkey Point Unit 3 and 4

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Docket Files 50-250
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ORB1 Reading
CSParrish
MGrotenhuis

The following documents concerning our review of the subject facility are transmitted for your information:

- ☐ Notice of Receipt of Application.
- ☐ Draft/Final Environmental Statement, dated _____.
- ☐ Safety Evaluation, or Supplement No. _____, dated _____.
- ☐ Notice of Hearing on Application for Construction Permit.
- ☐ Notice of Consideration of Issuance of Facility Operating License.
- ☐ Application and Safety Analysis Report, Vol. _____.
- ☐ Amendment No. _____ to Application/SAR, dated _____.
- ☐ Construction Permit No. CPPR- _____, dated _____.
- ☐ Facility Operating License No. DPR- _____, NPF- _____, dated _____.
- ☐ Amendment No. _____ to CPPR- _____ or DRR- _____, dated _____.
- ☒ Other: Monthly operating report for May 1980.
- ☒ (8006170467).

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:
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cc: Chief
Division of Ecological Services
Bureau of Sport Fisheries & Wildlife
U. S. Department of the Interior
Washington, D. C. 20240

Director
National Oceanographic Data Center
Environmental Data Service
National Oceanic & Atmospheric Administration
U. S. Department of Commerce
Washington, D. C. 20235

Dr. James T. Tanner
National Bureau of Standards
Reactor Building 235
Washington, D. C. 20234

Director
Technical Assessment Division
Office of Radiation Programs (AW-459)
U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

U. S. Environmental Protection Agency
Region IV Office
ATTN: EIS COORDINATOR
345 Courtland Street, N.E.
Atlanta, Georgia 30308

REGULATORY DOCKET FILE COPY

Docket No. 50-250
50-251

September 22, 1980

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- ☐ Amendment No. _____ to CPPR- _____ or DRR- _____, dated _____.
- ☒ Other: ~~Monthly operating reports for August 1980.~~
- ☒ (8009170279).

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Office of Nuclear Reactor Regulation

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U. S. Department of the Interior
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- ☐ Amendment No. _____ to CPPR- _____ or DRR- _____, dated _____.
- ☒ Other: Radioactive Effluent Release Data, Jan-June 1980, and
Environ Radiological monitoring Program Summary Jan-June 1980.
(8009090290).

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The first part of the report deals with the general situation of the country. It is a very interesting and informative study of the country's development. The second part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The third part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The fourth part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The fifth part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The sixth part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The seventh part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The eighth part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The ninth part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development. The tenth part of the report deals with the specific details of the country's development. It is a very detailed and thorough study of the country's development.

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