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ACCESSION NBR: 8012290400 DOC. DATE: 80/11/09 NOTARIZED: NO
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C
 AUTH. NAME AUTHOR AFFILIATION
 CHONIN, N. Oncavage, Mark
 CHONIN, N. Chonin, N.
 RECIP. NAME RECIPIENT AFFILIATION
 Atomic Safety and Licensing Board Panel

DOCKET #
 05000250
 05000251

SUBJECT: Request that intervenor & designated experts be allowed to enter site to measure, survey, test & photograph based on recent & continuing steam generator problems. Certificate of Svc encl.

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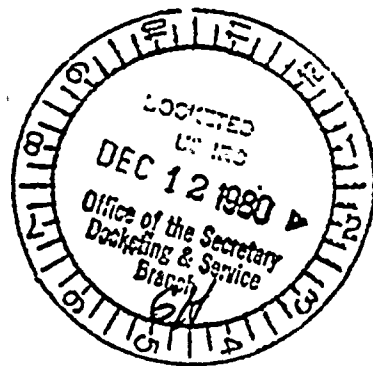
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ACTION:	PARRISH, C.	1	GROTHENHUIS, M	1
INTERNAL:	ASLAP	5	ASLB	1
	I&E	2	NRC PDR	1
	DELD, B. ANTON	1	PUBLIC AFFAIRS	1
	REG FILE	1		
EXTERNAL:	LPDR	1	NSIC	1



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

(Turkey Point Nuclear Generating

Unit Nos. 3 and 4)

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

MOTION TO PERMIT ENTRY
UPON TURKEY POINT SITE

COMES NOW the Intervenor, Mark Oncavage, and moves this Board for an Order allowing the Intervenor and any experts designated by the Intervenor to enter upon the Turkey Point Site for the purpose of inspection, measuring, surveying, photographing, testing, or sampling the property or any designated object or operation thereon pursuant to 10 CFR 2.741 and as grounds therefor states:

1. That the Turkey Point Plant has had recent and continuing problems with the steam generators which are the subject matter of this action.

2. That Unit Number Three (3) recently began to leak up to two-hundred and forty (240) gallons of radioactive water per day.



3. That about twenty (20) percent of Unit Number Three's tubes, nearly ten thousand (10,000) tubes have been plugged since 1976 and said plugs have recently begun to develop radioactive leaks.

4. That Florida Power and Light Company is unaware and is uncertain as to what is causing the latest leaks and whether or not the leaks are related to previous problems that have occurred in November of this year.

5. That the very recent tube leaks were first noticed on November 19, 1980 at which time the tubes were leaking a half gallon per hour. That the leakage has gradually increased and stabilized at ten (10) gallons per hour and on November 22, 1980 continued at that level until a voluntary shut-down was instituted by Florida Power and Light Company.

6. That recently a rumbling probably caused by surging water shook Unit Number Three and broke a two inch pipe that spewed out thousands of gallons of cooling water.

7. That Mark Oncavage as the Intervenor has the right to make an independent inspection to determine what damage if any these latest problems have caused to the steam generators and whether or not there has been radioactive leakage into the various cooling canals and surroundings areas of the Turkey Point Site.

8. That the Intervenor wishes to examine the Plant Survey Reports starting January 1, 1978, the environmental radiological monitoring data starting January 1, 1978, and the workers dosimetry records starting January 1, 1978, and in addition wishes to do a physical radiological survey of Turkey Point and Environs, to obtain samples of the air, water, soil, sediment, and various biota

forms. That the above inspections are relevant and could lead to admissible evidence concerning contentions number 2, 3, 7, 9, and 13.

WHEREFORE the Intervenor respectfully petitions this Board to immediately allow the Intervenor to conduct inspections as described above pursuant to 10 CFR subpart G, Section 2.741.

LAW OFFICES OF NEIL CHONIN, P.A.
Counsel for Intervenor
Suite 1400 Amerifirst Bldg.
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By


Neil Chonin

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

CERTIFICATE OF SERVICE

I HERBY CERTIFY that a copy of the attached Motion to Permit Entry Upon Turkey Point Site in the above captioned 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, Esq.
Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

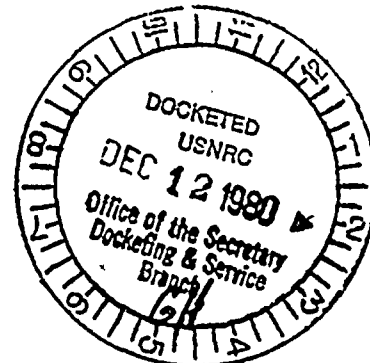
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DATED: November 9, 1980.

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