

LAW OFFICES

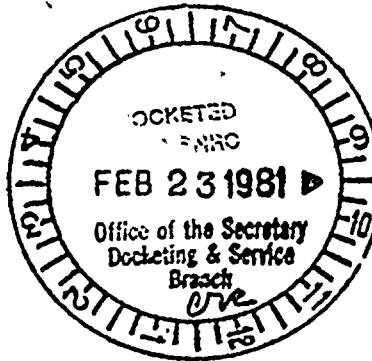
Neil Chonin, P.A.

NEIL CHONIN

TRIAL PRACTICE
PERSONAL INJURY
& WRONGFUL DEATH
MARITAL & FAMILY LAW

MARILYN SHER

KATHLEEN PHILLIPS



RELATED CORRESPONDENCE

1400 AMERI-FIRST BUILDING
ONE SOUTHEAST THIRD AVENUE

Miami, Florida 33131

TELEPHONE (305) 377-3023

February 19, 1981

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

Re: In the Matter of Florida Power & Light
Company (Turkey Point Nuclear Generating
Units Nos. 3 and 4) Docket Nos. 50-250
and 50-251.

Dear Members of the Board:

I wish to respond to Florida Power and Light's letters of January 28, 1981 and February 13, 1981, because I think the record should be set clear concerning the intervenor's position.

Florida Power and Light seems to take for granted the fact that these repairs are going to proceed and that everything should occur in order that they can begin the repairs on their schedule. We do not want these repairs to begin until there has been a full and complete hearing and particularly until an EIS has been prepared that complies with the law. We would further point out that Florida Power and Light has chosen October to begin their repairs with full knowledge that that is the height of the hurricane season and probably is the most dangerous time within which to commence the repairs.

We strongly object to the substitution of any Board member. The three of you have had this case from the beginning and it would be highly prejudicial to the intervenor if new members begin to replace any of the three of you.

We agreed to the proposed schedule in the interest of compromise. Compromise has not been achieved.

Very truly yours,

Neil Chonin
Neil Chonin

DS03

1/0

cc: To Attached List.

8102270593

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

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

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

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

Harold F. Reis, Esq.
Steven P. Frantz, Esq.
Lowerstein, Newman, Reis & Axelrad
1025 Connecticut Avenue, N.W.
Washington, D. C. 20036

Steven C. Goldberg, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Burt Saunders, Esq.
Assistant Dade County Attorney
1626 Dade County Courthouse
Miami, Florida 33130

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

Norman A. Coll, Esq.
STEEL, HECTOR & DAVIS
1400 S. E. First Nat. Bank Bldg.
Miami, Florida 33131

