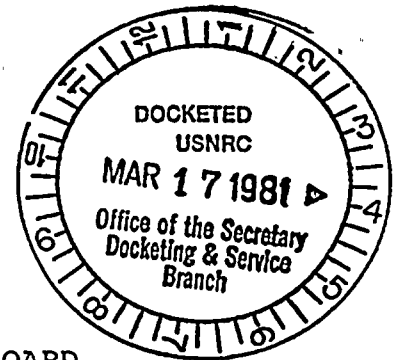


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

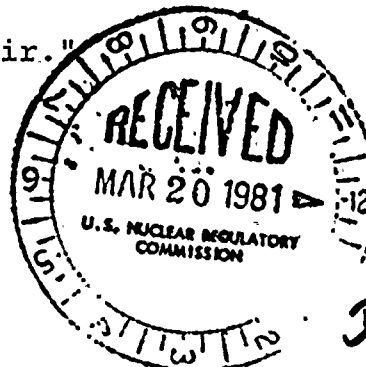


BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

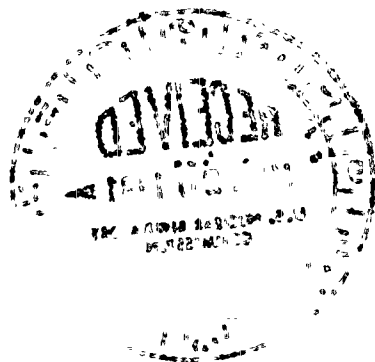
FPL'S ANSWER IN SUPPORT OF
THE NRC STAFF MOTION FOR SUMMARY
DISPOSITION OF CONTENTION 14

Pursuant to 10 C.F.R. § 2.749(a), Florida Power & Light Company (FPL) hereby files its answer in support of the motion for summary disposition of Contention 14 filed by the NRC staff on February 20, 1979. FPL has examined the motion and the supporting affidavits and related material attached to the staff's motion. FPL agrees that there is no genuine issue to be heard with respect to the fifteen material facts enumerated in the motion. FPL wishes particularly to emphasize material fact numbered 5, which states in part: "Of paramount significance, a fire inside containment cannot cause offsite radioactivity exposures of any consequence since the fuel will be removed from the containment of the unit under repair."



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Accordingly, FPL submits that the motion should be granted.

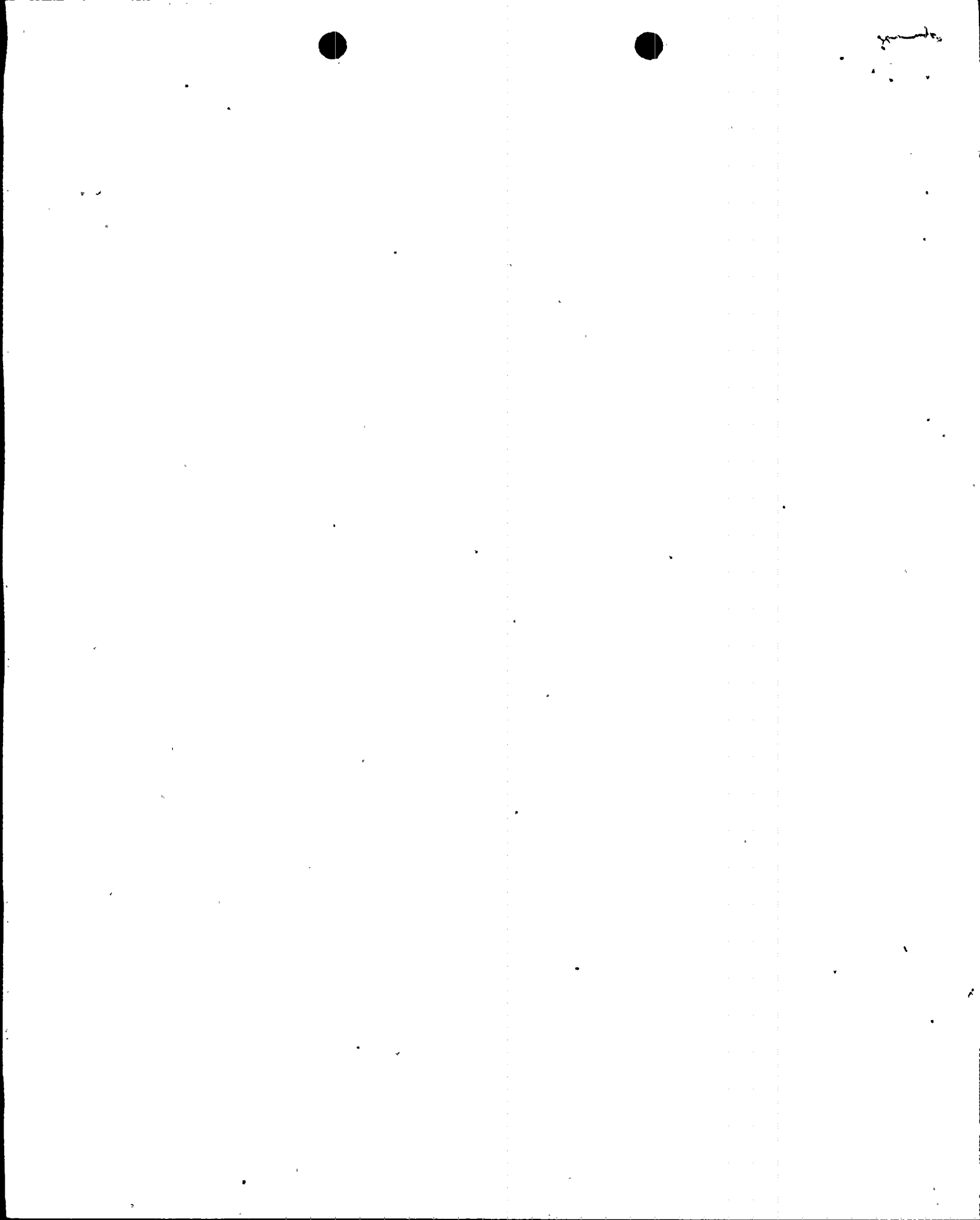
Respectfully submitted,



Harold F. Reis

Lowenstein, Newman, Reis & Axelrad
1025 Connecticut Avenue, N.W.
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Telephone: (202) 862-8410

March 16, 1981



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket No. 50-250
)	50-251
FLORIDA POWER AND LIGHT COMPANY)	(Proposed Amendments to
)	Facility Operating
(Turkey Point Nuclear Generating)	Licenses to Permit Steam
Unit Nos. 3 and 4))	Generator Repair

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT copies of the foregoing "FPL's Answer in Support of the NRC Staff Motion for Summary Disposition of Contention 14" was served on the individuals whose names appear on the attached service list by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below.



Harold F. Reis

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March 16, 1981

Attachment

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket No. 50-250
)	50-251
FLORIDA POWER AND LIGHT COMPANY)	(Proposed Amendments to
)	Facility Operating
(Turkey Point Nuclear Generating)	Licenses to Permit Steam
Unit Nos. 3 and 4))	Generator Repair

SERVICE LIST

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

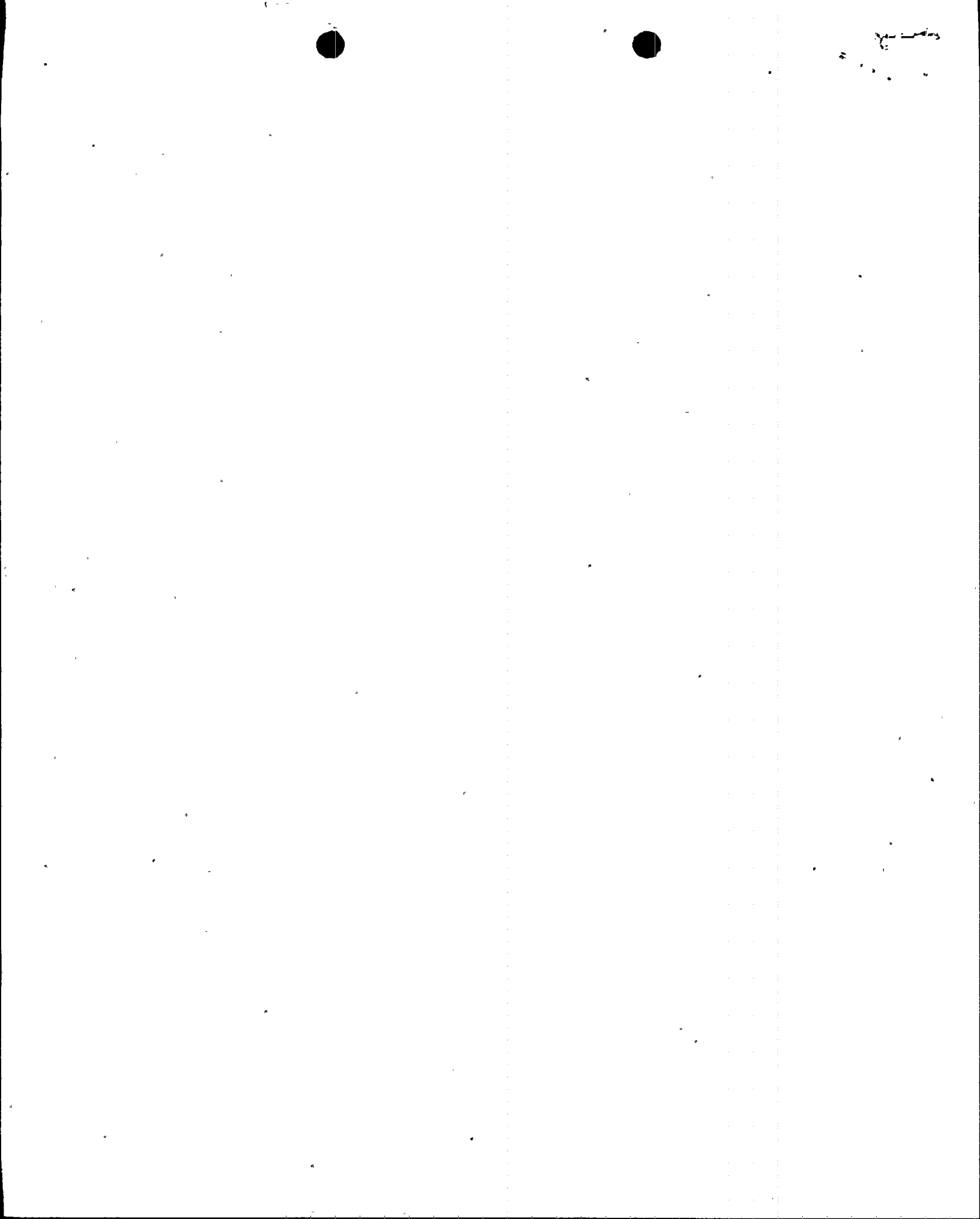
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Page Two

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