

STEEL HECTOR & DAVIS
SOUTHEAST FIRST NATIONAL BANK BUILDING
MIAMI, FLORIDA 33131
TELEX 51-5758

RELATED CORRESPONDENCE

NORMAN A. COLL
(305) 577-2863

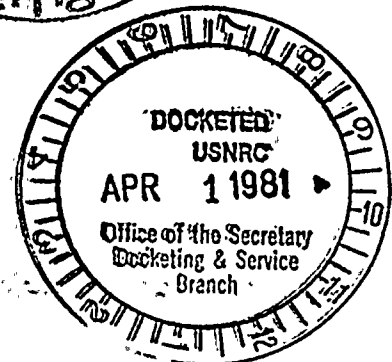
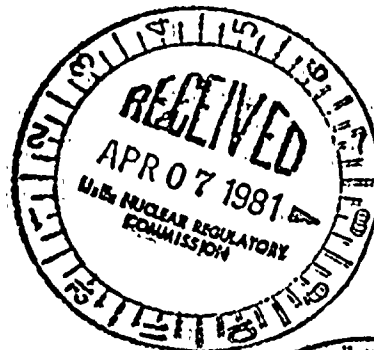
March 27, 1981

PALM BEACH OFFICE
205 WORTH AVENUE
PALM BEACH, FLORIDA 33480

Marshall E. Miller, 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



Re: In the matter of Florida Power & Light Company
(Turkey Point Nuclear Generating Units Nos. 3 and
4) Docket Nos. 50-250 SP, 50-251 SP (Proposed
Amendments to Facility Operating Licenses to Permit
Steam Generator Repair)

Dear Members of the Board:

In accordance with the Board's ruling at the March 24, 1981 pre-hearing conference on the Intervenor's "Motion to Permit Entry Upon Turkey Point Site" of December 9, 1980, in which the Board requested the Intervenor and Applicant to simultaneously file with the Board by Monday March 30, 1981 reasonable limitations with respect to the site inspection by Intervenor, we submit the following on behalf of FPL:

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Intervenor Turkey Point Site Inspection

1. Date, Time, and Duration

FPL agrees with the request by Intervenor contained in the letter from Neil Chonin to Norman A. Coll of February 4, 1981 that the site inspection be conducted on a Sunday. FPL proposes that the time for such inspection be from 8:00 a.m. to 5:00 p.m., and that it be conducted April 5 or April 12, 1981.

2. Number of Persons

FPL agrees with the request by Intervenor contained in the letter from Neil Chonin to Norman A. Coll of February 4, 1981 that the persons who will conduct the Sunday site visit are to be Douglas King, Health Physicist; Mark Oncavage, Intervenor; Barry Levin, Ph.D., Health Physicist; and George Swensson, Fisherman.

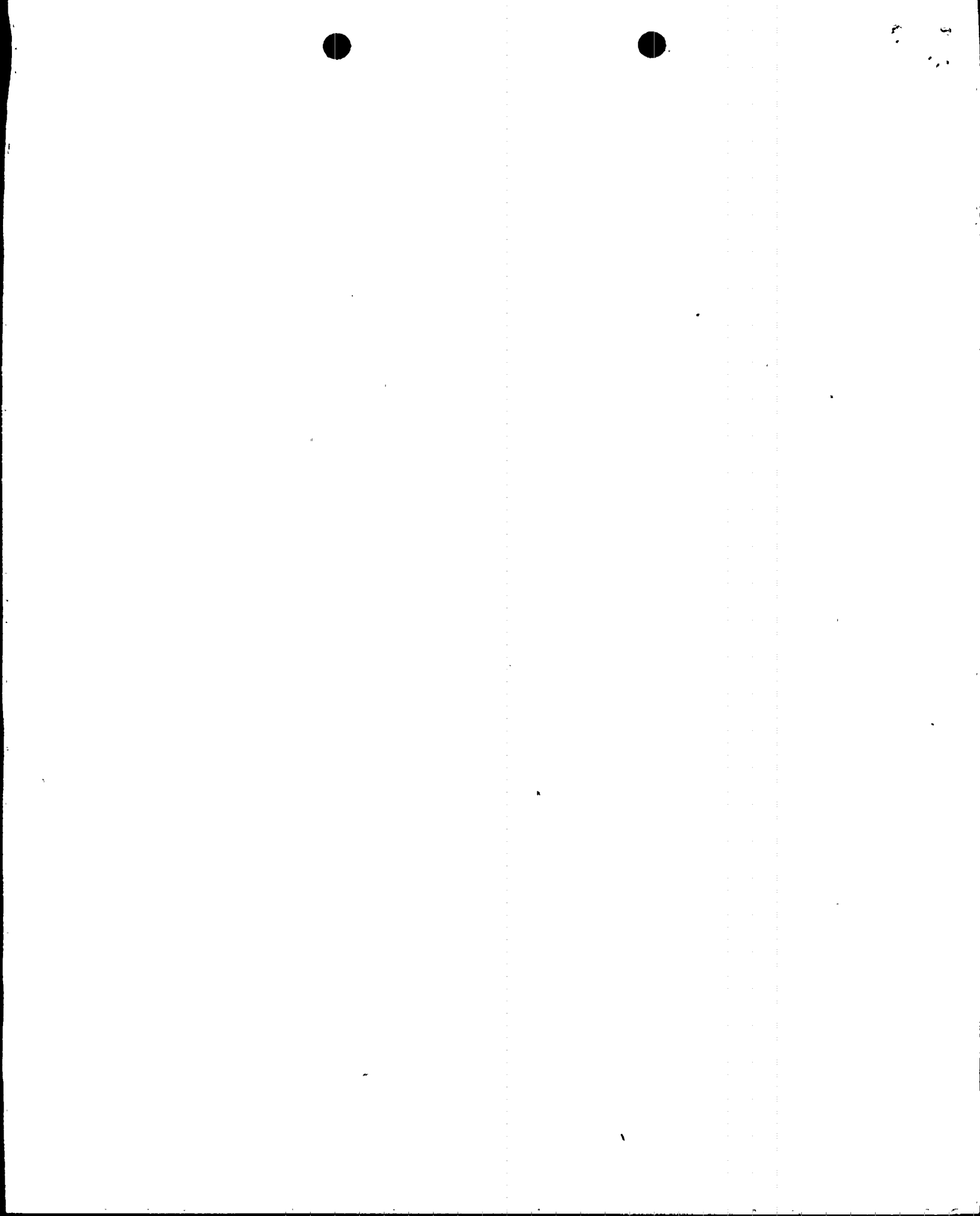
3. Procedure for Entry to and Exit From Site

All persons, instruments, equipment, and supplies will be checked by FPL for contamination prior to entry on site and commencement of the site inspection, and upon completion of the site inspection and prior to exit from the site. Normal security procedures including a hands on search will be required for entrance to and exit from the protected (security) area.

4. Area of Site Inspection

A. Areas of the site property outside the fence which encloses the protected (security) area, including the cooling canal system, except for areas within one half mile of the southwest section of the canal system, which is known to be the preferred habitat of the American crocodile, for which the breeding season has begun.

B. Areas of the site property inside the fence which encloses the protected (security) area which are not within the radiation controlled area. (Includes areas viewed and visited by ASLB and Mr. Oncavage, at familiarization tour Wednesday March 24, 1981.)



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C. Areas of the site property within the radiation controlled area which are not within a designated high radiation area (10 CFR 20.202(b)(3)) and/or posted contaminated area.

a. ALARA principles and good radiation protection practices require control and limitation of access to the radiation controlled area.

b. Persons wishing to enter the radiation controlled area will be required to have a whole body count prior to entry, and upon exit, and will be required to wear a pocket dosimeter and TLD which will be provided by FPL. No protective clothing will be required.

5. Escorts During Site Inspection

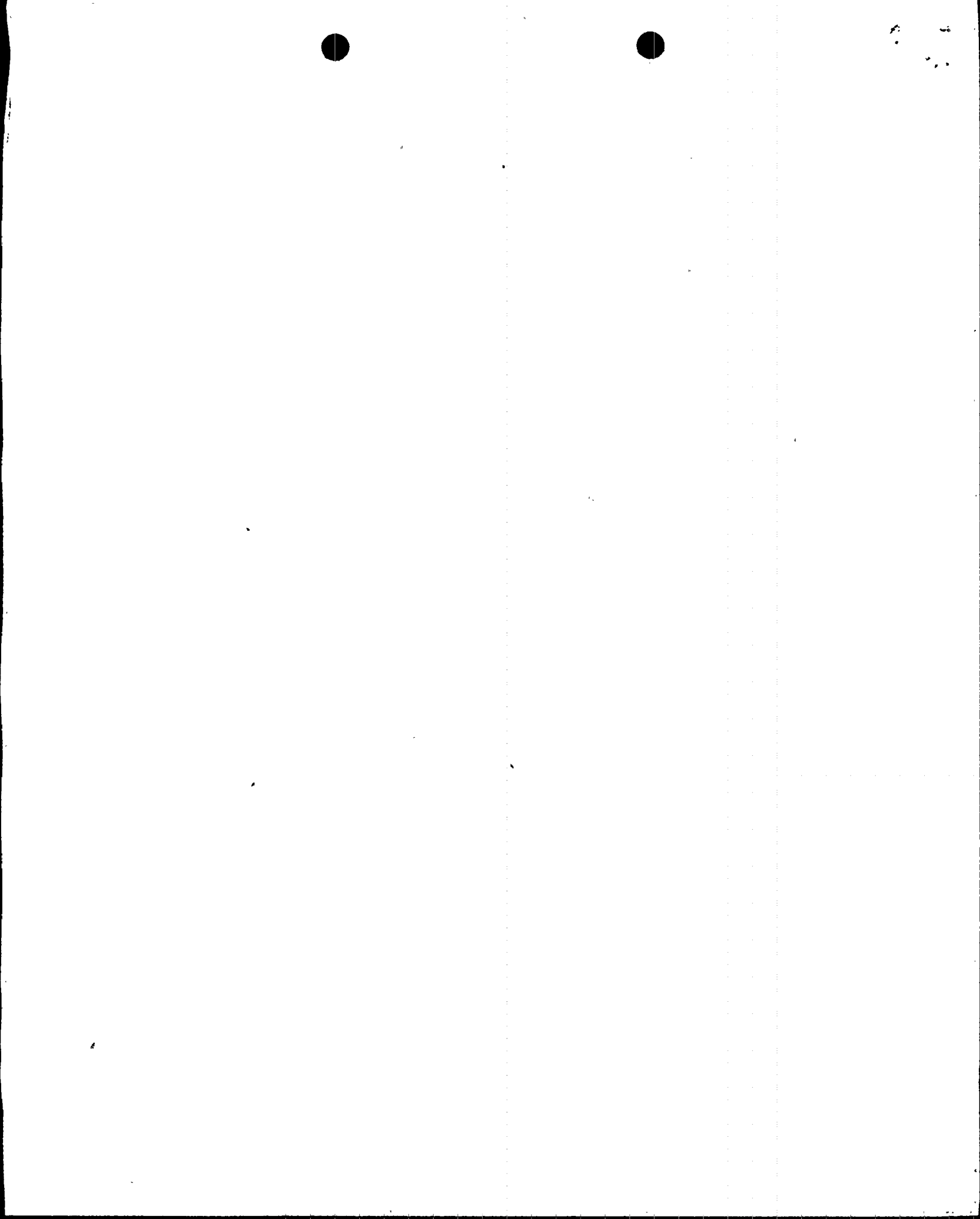
Persons conducting the site inspection will be escorted at all times by an FPL Health Physics person and a security guard person. The NRC staff has offered to have the resident NRC inspector accompany the site inspection.

6. Sampling Procedures

A. Permits--

(a) As indicated by signs at the entrance to the site, the Turkey Point Plant Site is designated as the "McGregor Smith Wildlife Preserve", and it has been so designated since 1973. The purpose of such designation is to preserve and protect the wildlife which inhabit the area within the site boundary. FPL permits no hunting, fishing, or trapping within the site boundary except for collection of scientific samples pursuant to appropriate licenses and permits.

(b) If it is intended, as indicated in the letter from Neil Chonin to Norman A. Coll of February 4, 1981 for the site inspection to include the taking of ". . . small animals, birds, fish, reptiles. . .", including but not limited to shellfish, sponges, oysters, clams, crustacea, stone



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crabs or blue crabs, appropriate licenses and permits, including if necessary, scientific collecting permits must first be obtained from the State of Florida, and exhibited to FPL. All state laws and regulations regarding legal seasons, sizes, bag or creel limits, and gear are to be adhered to in the collection of same.

(c) All state and federal laws and regulations regarding threatened or endangered species are to be strictly observed.

B. Split Samples

Split samples shall be furnished to FPL for analysis procedures set forth below.

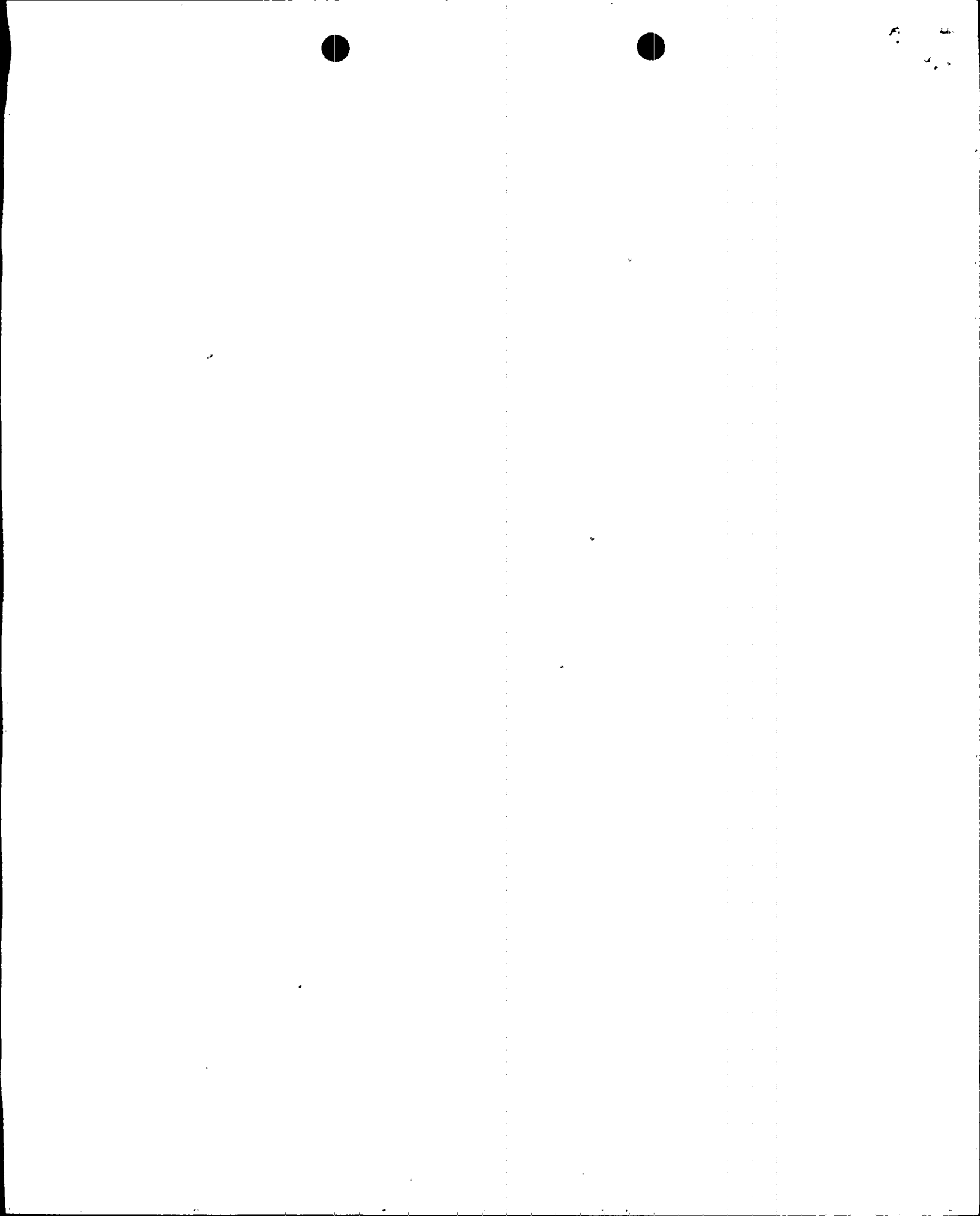
7. Analysis Procedures

A. NRC Regulations (10 CFR Part 30), and FPL Operating Procedures and Health Physics Procedures adopted pursuant to Technical Specifications which form a part of its Operating Licenses prohibit FPL from releasing radioactive, contaminated, or potentially radioactive or contaminated material from the site unless the levels and concentrations are below certain exempt limitations or unless transfer of the material is made to a person licensed to receive and possess such material, and in such event, specific authorizations must first be obtained and documented.

B. Consequently, all samples which Intervenor wishes to remove from the site must be surveyed before leaving to assure that they are below established release limits.

C. Only samples found to contain levels and concentrations of radioactivity and contamination below established release limits for the facility will be released for removal by Intervenor. FPL will obtain a split sample, and/or catalog and describe each sample released to Intervenor.

D. Any samples found to contain levels and concentrations of radioactivity and contamination above the release limits shall be released only in either of two (2) alternative methods:



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a. FPL will package and ship such samples to a mutually agreed upon independent laboratory licensed to receive same for analysis; kind of analysis to be mutually agreed upon; duplicate reports of the analyses by the laboratory shall be provided to Intervenor and FPL; FPL shall pay for packaging, shipment, and cost of the analyses for a reasonable number of such samples; or

b. After retaining split samples of each specimen, FPL will package and ship Intervenor's samples to a laboratory selected by Intervenor licensed to receive same for analysis; a report of the analyses by the laboratory shall be provided to Intervenor; Intervenor shall pay for packaging, shipment, and cost of the analyses. If split samples of each specimen are not practical, method (a) shall be utilized for release and analysis of such samples.

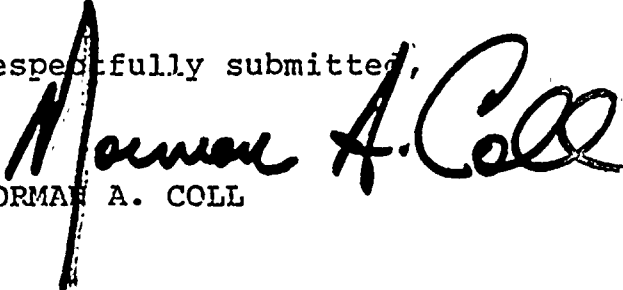
8. Monitoring and Sampling Equipment

Except as provided above, all monitoring and sampling equipment, including instruments, containers, tools, and other implements are to be provided by Intervenor.

9. Disclosure

Information obtained from monitoring, sampling, and/or analysis is not to be disclosed to persons not parties to this proceeding, including the news media, for publication or use in any manner whatsoever.

Respectfully submitted,


NORMAN A. COLL

NAC/wpm

cc: See attached Certificate of Service

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

IN THE MATTER OF)	
FLORIDA POWER & LIGHT COMPANY)	(Proposed Amendments to
(Turkey Point Nuclear Generating))	Facility Operating
Units Nos. 3 and 4)	License to Permit Steam
		Generator Repairs)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing
letter of March 27, 1981 to the Board were served on the
following by deposit in the United States mail, first class,
properly stamped and addressed, on the date shown below:

Marshall E. Miller, 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.
Lowenstein, 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 Floor
200 S.E. First Street
Miami, Florida 33131

Neil Chonin, Esq.
1400 AmeriFirst Building
One Southeast Third Avenue
Miami, Florida 33131

STEEL HECTOR & DAVIS
Co-counsel for Licensee
1400 Southeast First
National Bank Building
Miami, Florida 33131
Telephone (305) 577-2863

By


Norman A. Coll

March 27, 1981

