

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

FLORIDA POWER & LIGHT COMPANY )

(Turkey Point Nuclear Generating )  
Units 3 and 4) )

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

(Proposed Amendments to  
Facility Operating License  
to Permit Steam Generator  
Repairs)

4/6/81

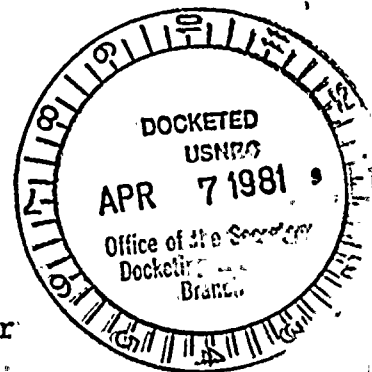
LICENSEE'S MOTION FOR SUMMARY  
DISPOSITION OF CONTENTION 7



Pursuant to 10 CFR §2.749, Florida Power & Light Company  
("FPL" or "Licensee") moves for summary disposition, in its  
favor, of Contention 7 which provides:

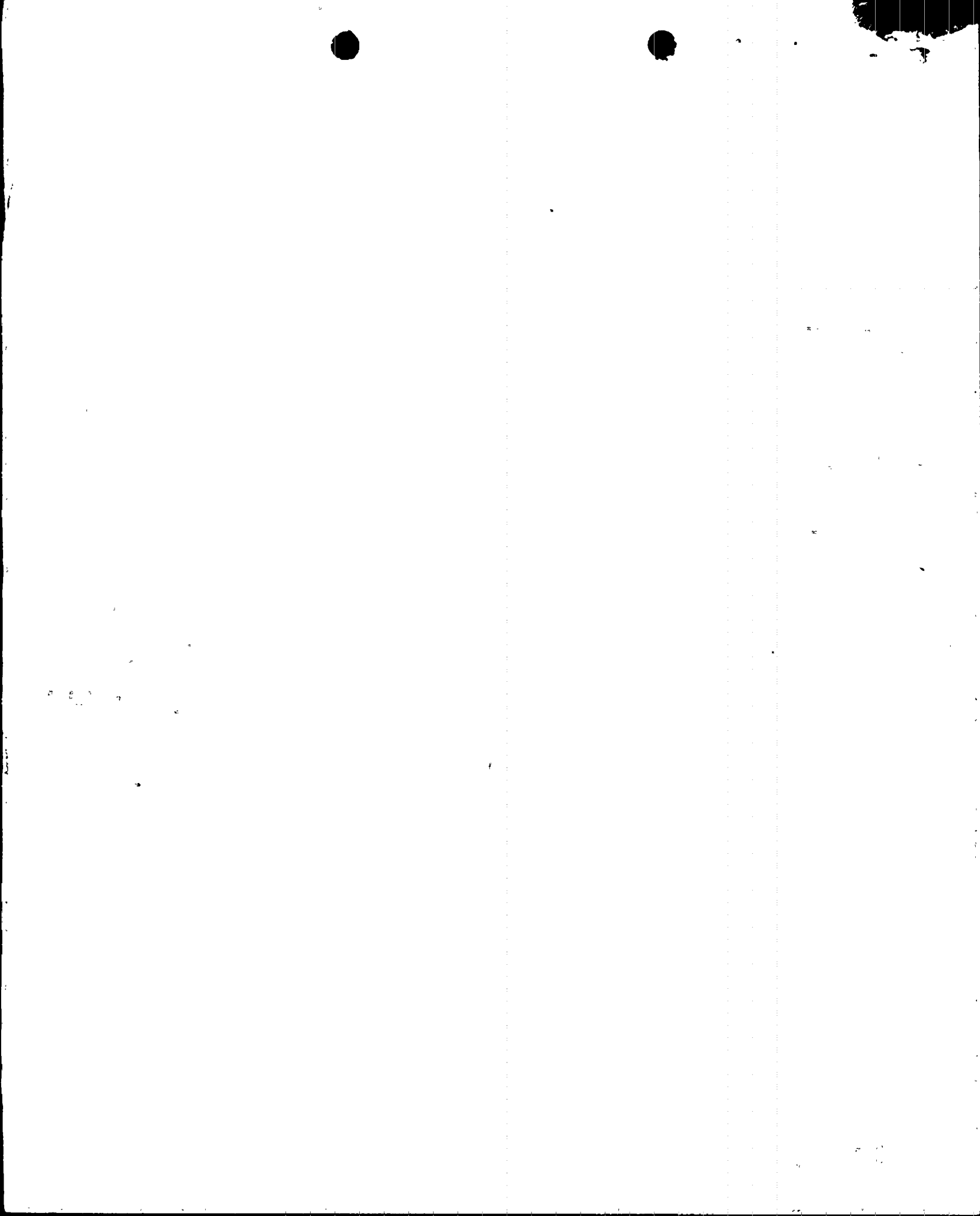
The SGRR is inadequate because:

- a. it has used the inaccurate figure of \$300,000 per day per unit for replacement power costs for reactor outage;
- b. it has failed to provide an analysis for an additional commitment of land resources for the storage of the defective steam generators;
- c. it has failed to consider the costs of addition of a full-flow condensate demineralizer and of condenser retubing;
- d. it has failed to update costs from December 1977 due to inflation.



8104140456

DS03  
30/1



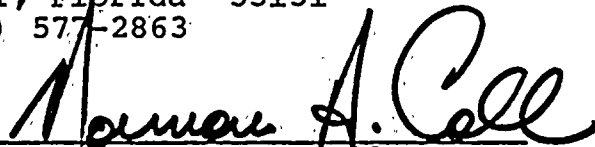
The grounds for this motion are that, as to the matters raised in this contention, there exists no genuine issue of material fact and that Licensee is entitled to a favorable decision as a matter of law.

An affidavit, a statement of the material facts as to which there is no genuine issue, and a memorandum of law in support of this motion are attached.

Respectfully submitted,

STEEL HECTOR & DAVIS  
Co-Counsel for Licensee,  
Florida Power & Light Company  
1400 Southeast First National  
Bank Building  
Miami, Florida 33131  
(305) 577-2863

By:



Norman A. Coll

Date: April 6, 1981

cc: See attached Certificate  
of Service.

