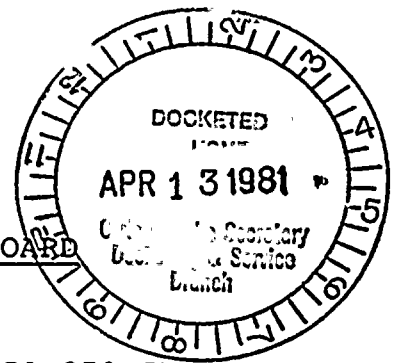


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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)

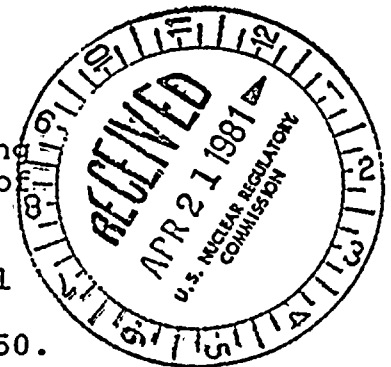
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LICENSEE'S MOTION FOR SUMMARY
DISPOSITION OF CONTENTIONS 3 AND 6

Pursuant to 10 CFR §2.749, Florida Power & Light Company, ("FPL" or "Licensee") moves for summary disposition, in its favor, of Contentions 3 and 6 which provide:

Contention 3 - During the course of the repairs proposed by the Licensee, (a) the handling, processing, storing or discharging of primary coolant or (b) the discharging of laundry waste water is likely to result in the release of radioactive material to unrestricted areas in quantities which will not be as low as is reasonably achievable within the meaning of 10 CFR Parts 20 and 50.

Contention 6 - The cumulative offsite radiation releases as a result of all activity at Turkey Point, during the proposed repairs, do not comply with 10 CFR Parts 20 and 50.



The grounds for this motion are that, as to the matters raised in these contentions, there exists no genuine issue of

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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
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Bank Building
Miami, Florida 33131
(305) 577-1863

By: 

Norman A. Coll

Date: April 8, 1981

cc: See attached Certificate
of Service.

