

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-250-SP
)	50-251-SP
FLORIDA POWER & LIGHT COMPANY)	
)	(Proposed Amendments to
(Turkey Point Nuclear Generating)	Facility Operating License
Units 3 and 4))	to Permit Steam Generator
		Repairs)

STATEMENT OF MATERIAL FACTS AS TO WHICH THERE
IS NO GENUINE ISSUE TO BE HEARD (CONTENTIONS 3 and 6)

Contention 3

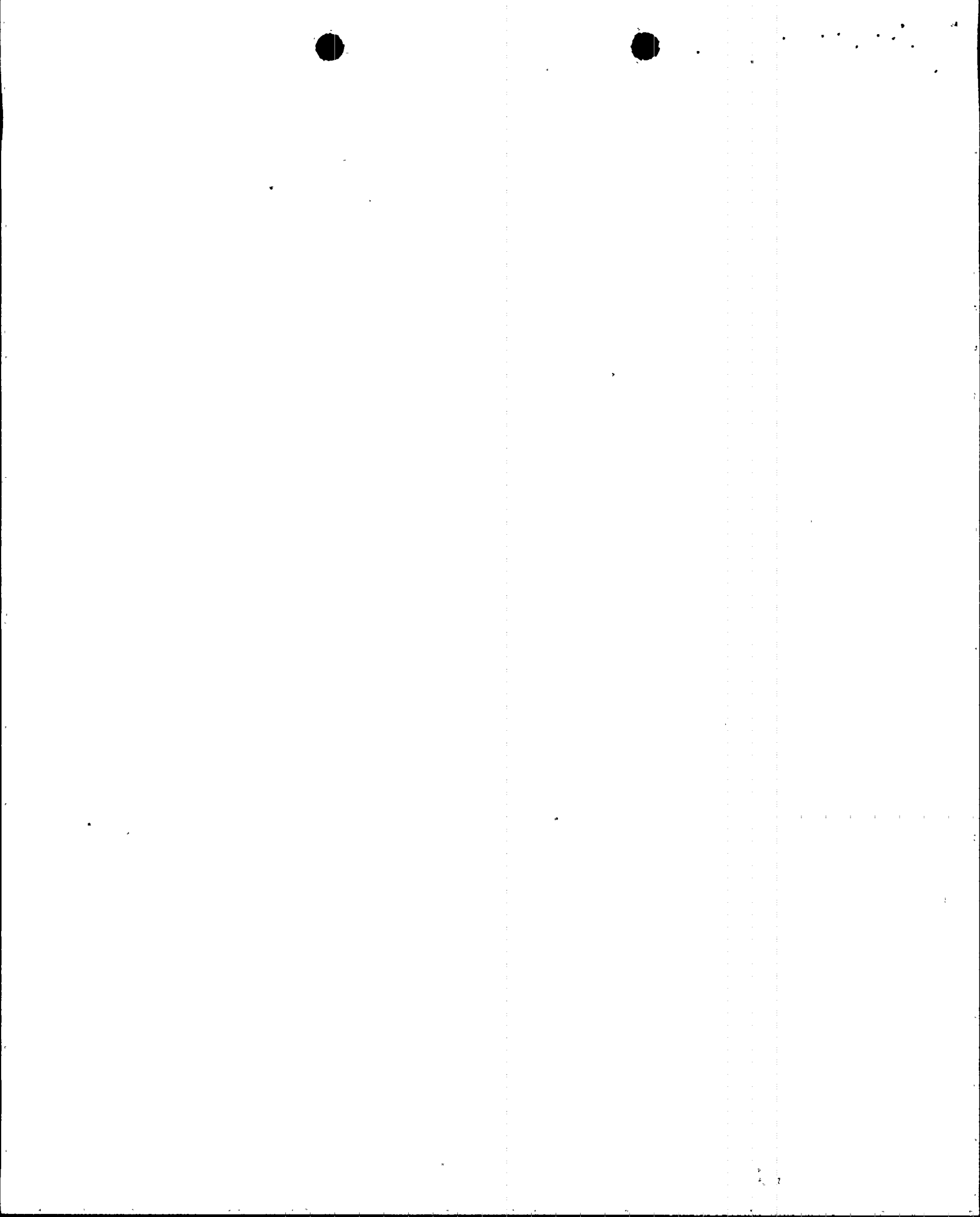
1. Section 5.2.2.4 of the Steam Generator Repair Report (SGRR) contains an analysis of the liquid releases which may be expected to result from the operations associated with the steam generator repair.

2. The data presented in Tables 5.2-4 and 5.2-5 of the SGRR are representative of concentrations which can be expected in reactor coolant and laundry waste water, respectively.

3. The values in Table 5.2-6 of the SGRR, which gives the estimated releases with the discharged liquid waste, are reasonable.

4. In the event that processed primary reactor coolant and laundry waste water are to be discharged, the discharge will be into the canal system.

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5. A conservative estimate of the maximum individual dose from all liquid releases during the repair (including primary reactor coolant and laundry waste water) has been calculated using the methods outlined in NRC Regulatory Guide 1.109.

6. The dose from these releases meets the requirements of Section II, Paragraphs A and D of Appendix I to 10 CFR Part 50.

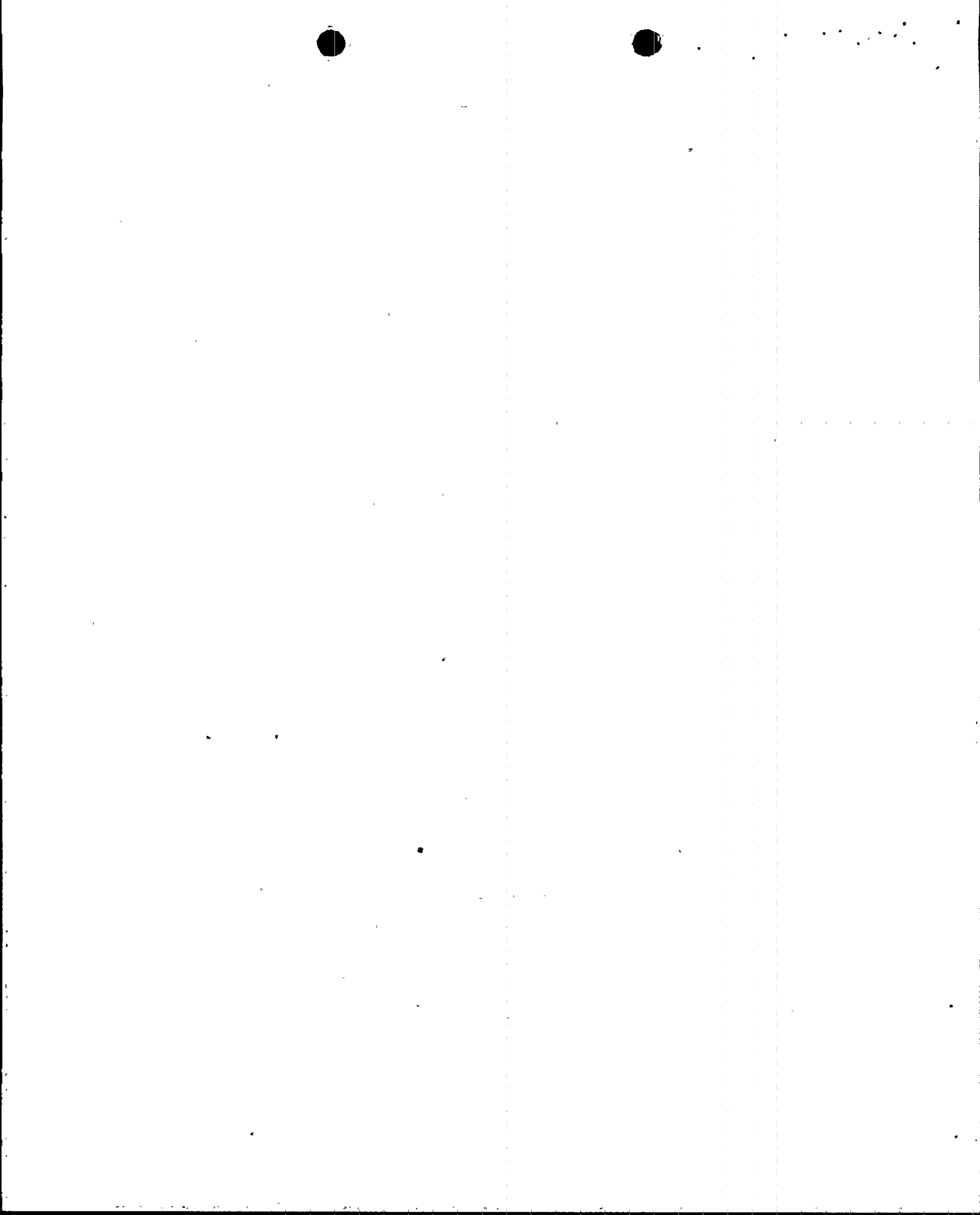
7. The liquid releases from the steam generator repair (including primary reactor coolant and laundry waste water) are as low as reasonably achievable within the meaning of 10 CFR Parts 20 and 50.

Contention 6

8. The period July 1979 to June 1980 fairly represents releases which may be expected from the operating unit during the repair of the other.

9. The total liquid releases to be expected from one operating unit and the repair of the other unit can be estimated by adding the actual liquid releases of radioisotopes from one operating unit during the period from July 1, 1979 - June 30, 1980, and the estimated liquid releases from the repair of one unit shown in Table 5.2-6 of the SGRR.

10. A conservative estimate of the maximum individual dose from the combined liquid releases has been calculated.



11. The dose from these combined liquid releases meets the requirements of Section II, Paragraph A, and Section II, Paragraph D of Appendix I to 10 CFR Part 50.

12. The total gaseous releases to be expected from one operating unit and the repair of the other unit can also be estimated by adding the actual gaseous releases of radioisotopes from one operating unit during the period from July 1, 1979 - June 30, 1980, and the estimated gaseous releases from the repair of one unit as shown in Table 5.2-2 of the SGRR.

13. A conservative estimate of the maximum individual dose from the combined gaseous releases has been calculated.

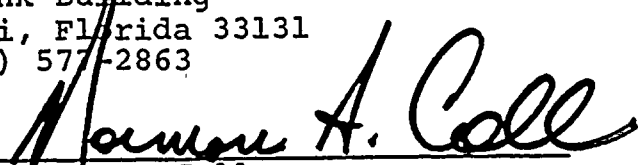
14. The maximum individual doses from the combined gaseous releases all meet the requirements of Section II, Paragraphs B, C, and D of Appendix I to 10 CFR Part 50.

15. The cumulative offsite liquid and gaseous radiation releases as a result of all activity at Turkey Point, during the proposed repairs, do comply with 10 CFR Parts 20 and 50.

Respectfully submitted,

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By:


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