

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	)	
	)	
(Turkey Point Nuclear Generating	)	(Proposed Amendments to
Units 3 and 4)	)	Facility Operating License
	)	to Permit Steam Generator
	)	Repairs)

LICENSEE'S MEMORANDUM OF LAW  
IN SUPPORT OF MOTION FOR  
SUMMARY DISPOSITION OF  
CONTENTIONS 3 AND 6

INTRODUCTION

Contentions 3 and 6 provide:

Contentions 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 unrestrictive 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.

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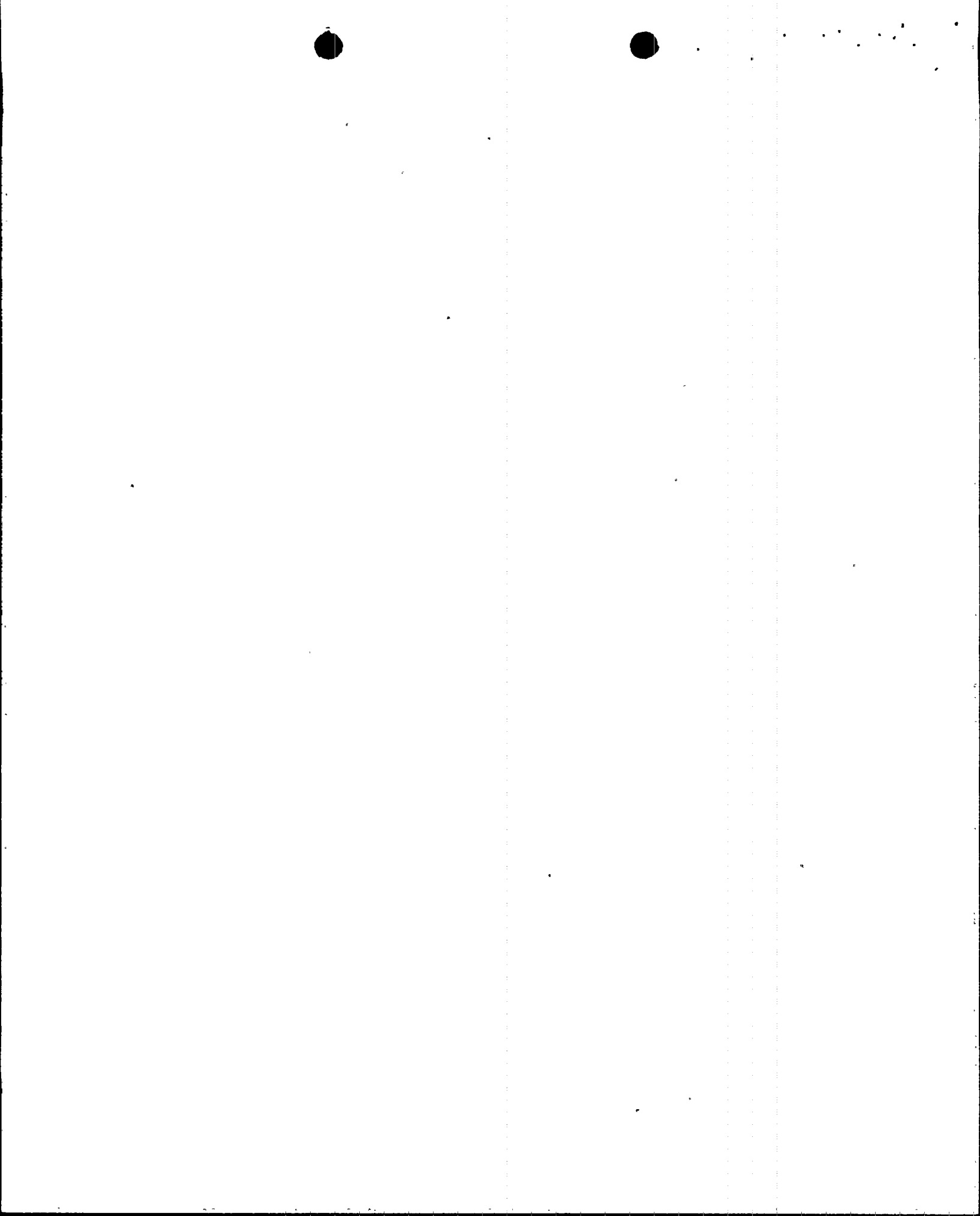


Licensee respectfully submits that the Board should grant summary disposition of Contentions 3 and 6 and dismiss them from these proceedings.

The applicable law related to Summary Disposition is set forth in the "Licensee's Memorandum of Law in Support of Motion for Summary Disposition of Contention 5 "April 2, 1981, which is incorporated herein by reference..

The affidavit of Dr. Walton A. Rodger addresses the matters raised by these contentions. With respect to Contention 3, Dr. Rodger's affidavit demonstrates that the estimated dose from the liquid releases (including primary reactor coolant and laundry waste water) attributable to the steam generator repairs meets the requirements of Section II, Paragraphs A and D of Appendix I to 10 CFR Part 50, and that these releases are as low as is reasonably achievable within the meaning of 10 CFR Parts 20 and 50. With respect to Contention 6, Dr. Rodger's affidavit demonstrates that the maximum individual dose from combined liquid and gaseous releases from both the operation of one steam generator unit and the repair of the other meets the requirements of Section II, Paragraphs A, B, C and D of Appendix I to 10 CFR Part 50, and that cumulative offsite radiation releases as a result of all activity at Turkey Point during the repairs comply with 10 CFR Parts 20 and 50.

Therefore, there is no genuine issue as to any material fact with respect to Contentions 3 and 6, and it is respectfully



submitted that summary disposition of these contentions should  
be granted in Licensee's favor.

Respectfully submitted,

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By: 

Norman A. Coll

Date: April 8, 1981



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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 Licensee's Motion for Summary Disposition of Contentions 3 and 6, Affidavit of Walton A. Rodger on Contentions 3 and 6, Licensee's Statement of Material Facts as to Which There is no Genuine Issue to be Heard (Contentions 3 and 6), and Licensee's Memorandum of Law In Support of Motion for Summary Disposition of Contentions 3 and 6 were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below:

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

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Atomic Safety and Licensing Board Panel  
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\*Dr. Oscar H. Paris, Administrative Judge  
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Hand or Courier

