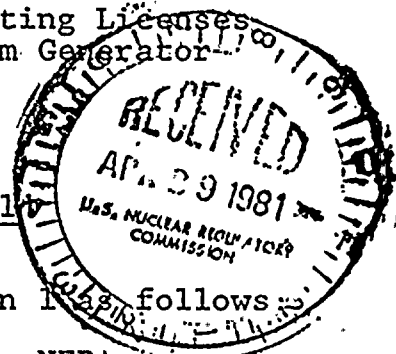
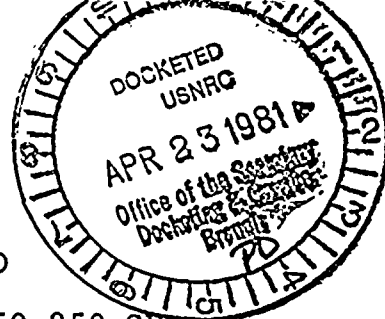


4/20/81
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
FLORIDA POWER & LIGHT COMPANY
(Turkey Point Nuclear Generating
Units Nos. 3 and 4)

) Docket Nos. 50-250-SP
) 50-251-SP
) (Proposed Amendments to
) Facility Operating Licenses
) to Permit Steam Generator
) Repair)



INTERVENOR'S AMENDMENT TO CONTENTION 1

COMES NOW the Intervenor and Amends his Contention 1 as follows

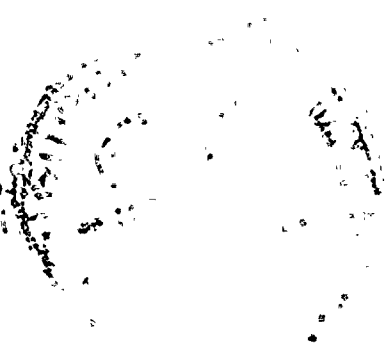
1. The EIS failed to follow section 1501.7 of the NEPA regulations in that the Staff failed to invite interested persons to participate in a scoping process in which the scope of the EIS was to be decided.
2. No record of decision was prepared for the Turkey Point Project in violation of 40 CFR 1505.2.
3. The EIS is not a programmatic EIS and a programmatic EIS is required as a result of the steam generator repairs that would be required nationally.
4. The final EIS fails to comply with NEPA in that the EIS does not address (to the fullest extent possible) all environmental effects of proposed actions as well as all irreversible and irretrievable resources.
5. The EIS fails to look at the socio-economic effects upon Florida Power and Light rate payers. Such effects must be examined fully within the EIS because the project entails direct significant

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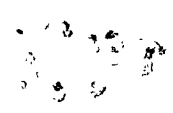
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16. The final EIS fails to adequately discuss the environmental impact of a hurricane if one occurs during the repair process.

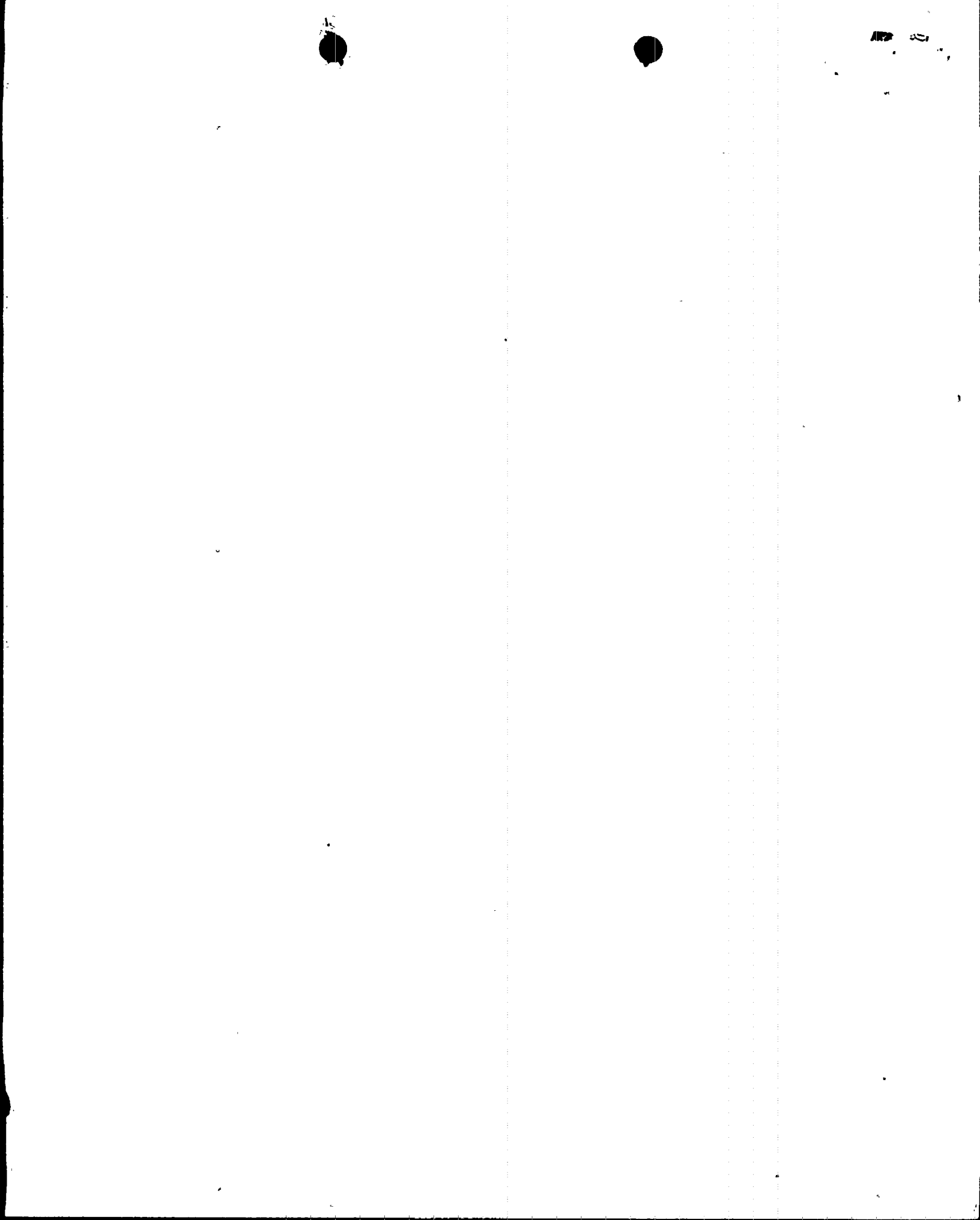
17. The final EIS fails to consider the long term effects of a nuclear waste building next to biscayne bay.

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By


Neil Chonin

DATED THIS THE 20th
DAY OF APRIL, 1981.



environmental effects which are intertwined with the socio-economic effects.

6. The EIS contains no glossary or table of definitions and consistently uses terminology beyond the ken of lay people.

7. The estimates of worker exposure provided for in the final EIS are unreasonably low.

8. The analysis of deaths and health effects likely to result from the action is invalid because it is based on outmoded scientific information.

9. The economic analysis in the EIS is invalid in that it fails to consider the possibility that replacement or repair of the steam generators may be necessary a second time.

10. The entire EIS fails to comply with a good faith consideration as is required under NEPA.

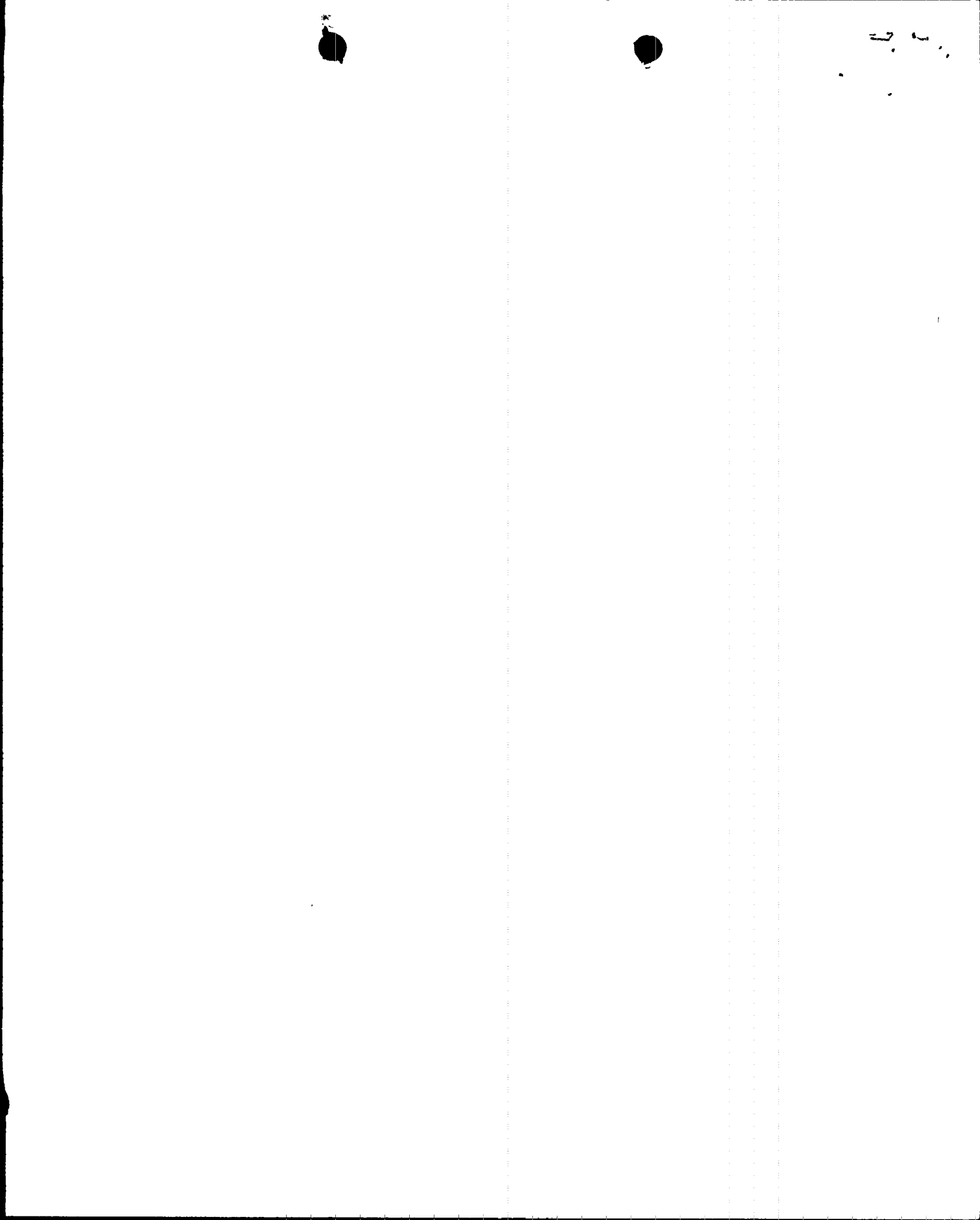
11. The analysis of alternatives is inadequate under NEPA.

12. The final EIS as a whole fails to adequately address the impact of the steam generator repair on the human environment because it tends to explore the positive effects that the repair will have while down-playing the negative impact.

13. The EIS fails to adequately discuss the alternatives to the proposed action.

14. The EIS fails to adequately discuss the relationship between local short term use of man's environment and maintenance and enhancement of the long term productivity.

15. The EIS fails to discuss the irreversible and irretrievable commitment of resources involved in the proposed action.



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)	50-251-SP
FLORIDA POWER & LIGHT COMPANY)	(Proposed Amendments to
)	Facility Operating Licenses
(Turkey Point Nuclear Generating)	to Permit Steam Generator
Units Nos. 3 and 4))	Repair)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, Intervenor's Amendment to Contention 1, was mailed by United States regular mail on this the 20th day of April, 1981, to the following addressees:

Marshall E. Miller, Esq. Administrative Judge
Chairman, Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

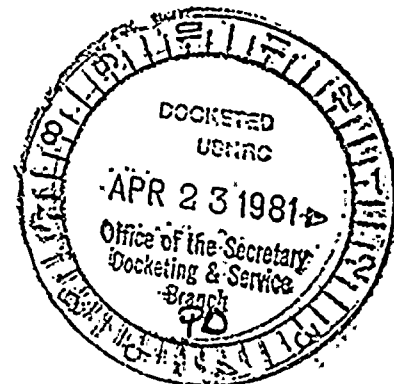
Dr. Emmeth A. Luebke, Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

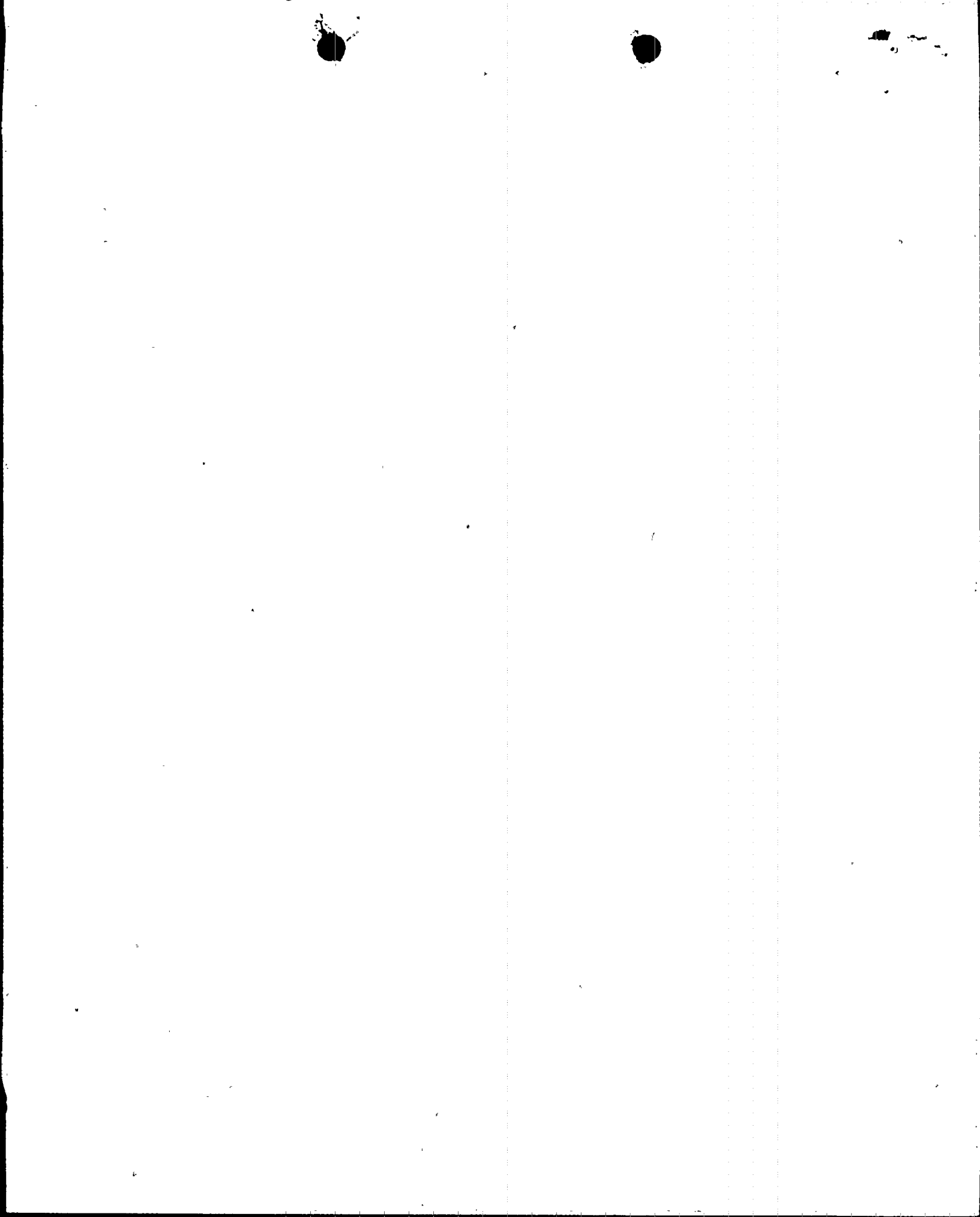
Dr. Oscar H. Paris, Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
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Washington, D. C. 20555





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

Docketing and Service Section
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