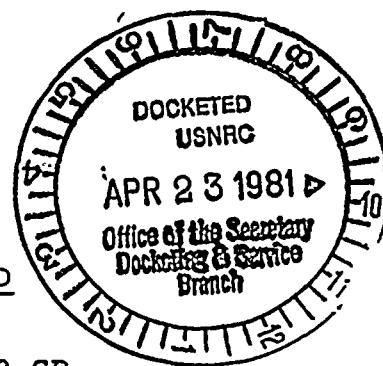


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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	)	Facility Operating Licenses
Generating Units Nos. 3	)	to Permit Steam Generator
and 4)	)	Repairs)

SL 422

LICENSEE'S RESPONSE TO INTERVENOR'S DISCOVERY REQUESTS

On April 14, 1981, Mark P. Oncavage (Intervenor) served "Intervenor Mark P. Oncavage's Request for the Production of Documents from Licensee, Florida Power and Light Company" (April 14th Request). On April 15, 1981, the Intervenor served "Intervenor Mark Oncavage's Request to Produce Documents from Licensee, Florida Power and Light Company" (April 15th Request).<sup>1/</sup> Florida Power and Light Company hereby submits its response to these requests.

I. April 14th Request

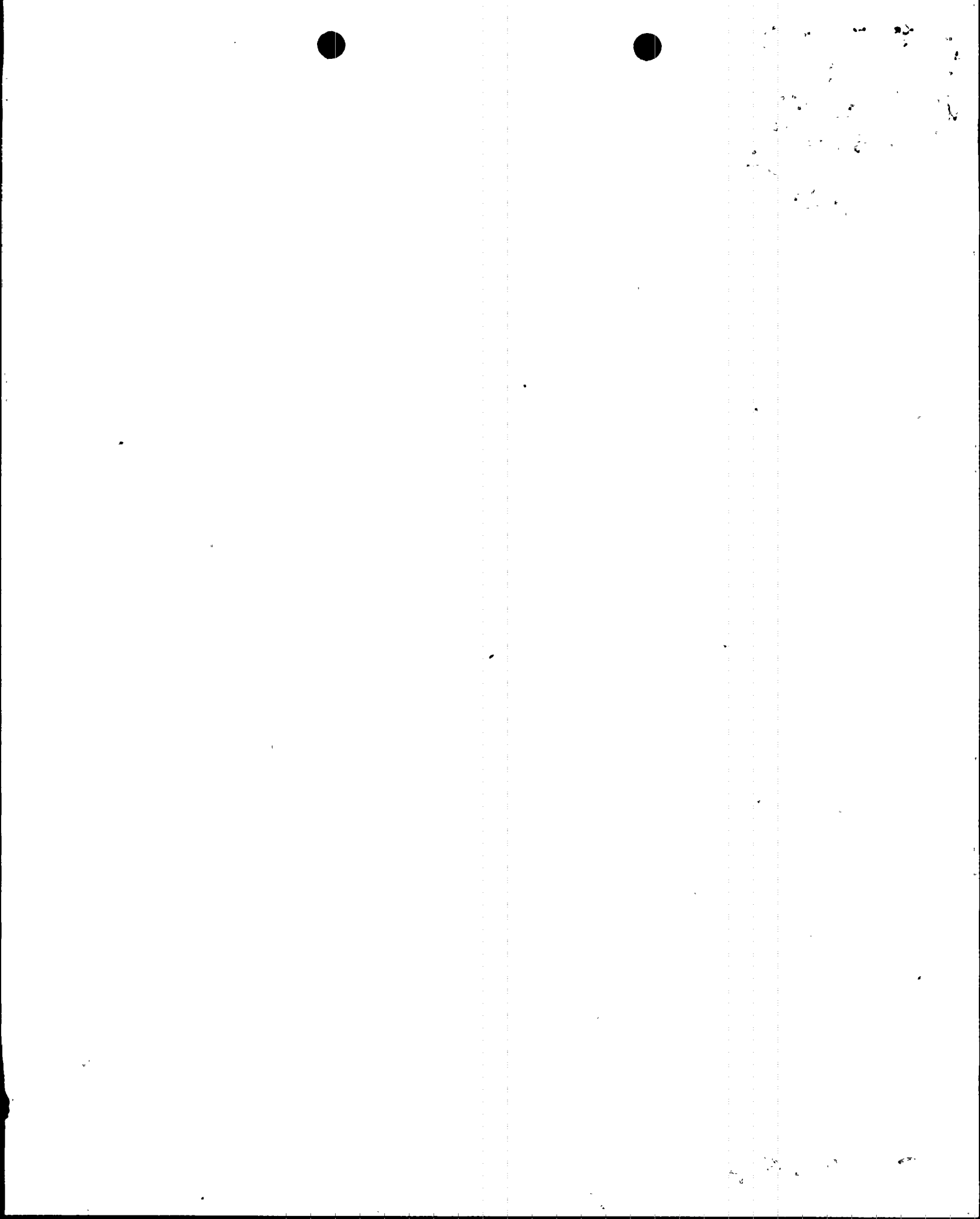
Request No. 1

The Licensee will produce a schedule for the repairs which contains the projected initiation and completion dates of the various tasks.

1/ On April 15, 1981, the Intervenor also served "Intervenor Mark P. Oncavage's Request to Produce Documents From the Staff of Florida Power and Light Company (sic)." Intervenor's attorney has informed us that this request is directed to the Staff of the Nuclear Regulatory Commission.

DS03  
S  
0/1

8104300487



Request No. 2

The Licensee will produce Westinghouse Report ST-RES-FJF-3030.

Request No. 3

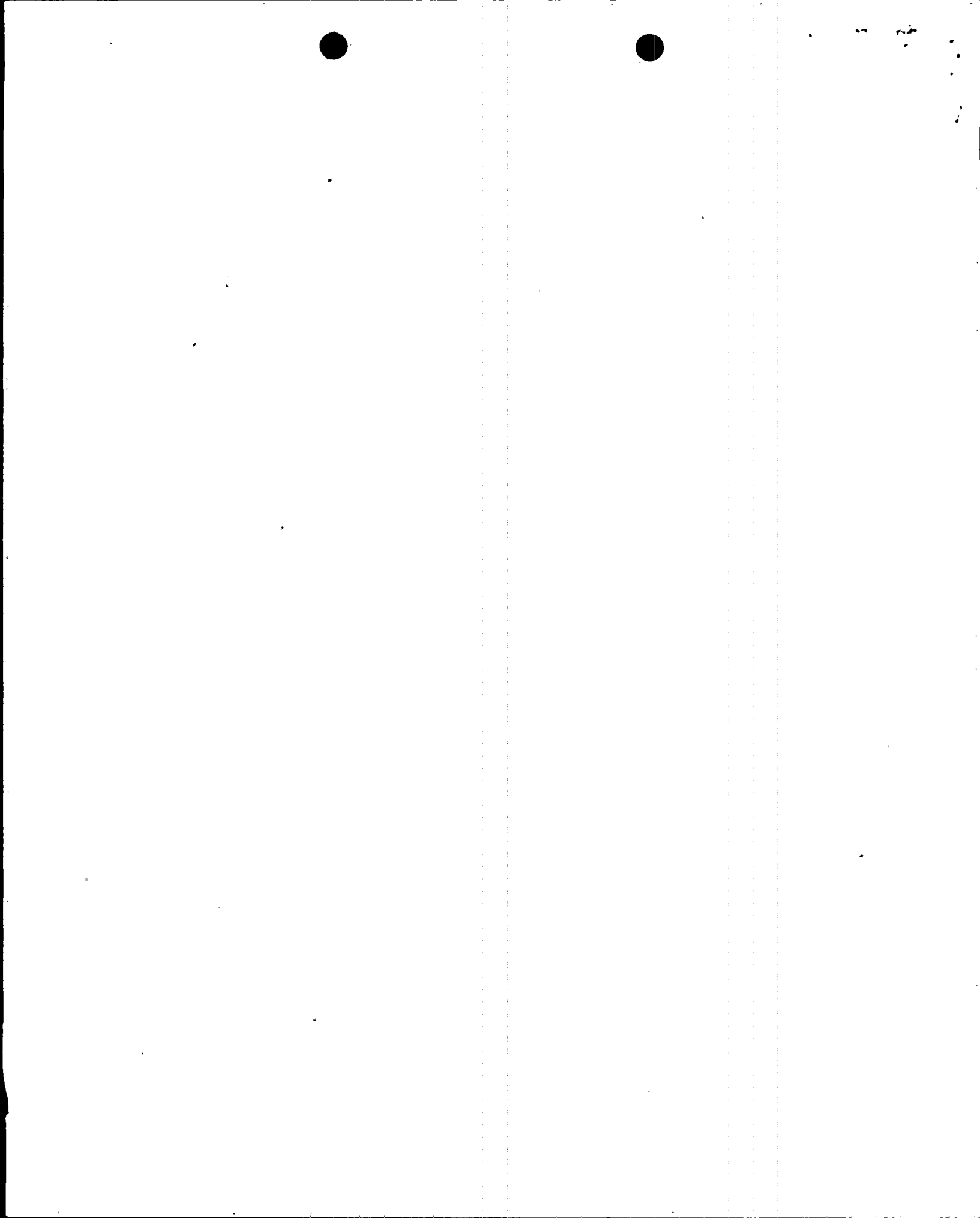
The reference to a document "concerning grit blasting" mentioned at the September 17, 1980, meeting at Homestead is vague and the Licensee is unclear as to the document which is requested. Due to the lack of specificity, the Licensee is unable to comply with this request. Moreover, on the basis of the description provided by the Intervenor, the Licensee doubts whether the requested document is in its possession.

Request No. 4

The Licensee will produce "Decontamination of a PWR Primary System, SENA Plant," Volume 33, Proceedings of the American Power Conference, 1981. Contrary to the assertion in the request, the Licensee did not use this document "to calculate offsite dose from decontamination processes."

Request No. 5

The Licensee objects to the production of the "examination results of all persons who will be involved in the repair." Initially, it should be noted that the identities of the vast majority of personnel who will be involved in the repairs are not presently known. Moreover, the request for the examination results of individual workers is not relevant to any contention admitted in this proceeding, nor is it designed to



lead to the discovery of admissible evidence. The results of a particular worker would not be relevant to establishing whether or not the repairs will comply with the ALARA principle.

II. April 15th Request

Request No. 1

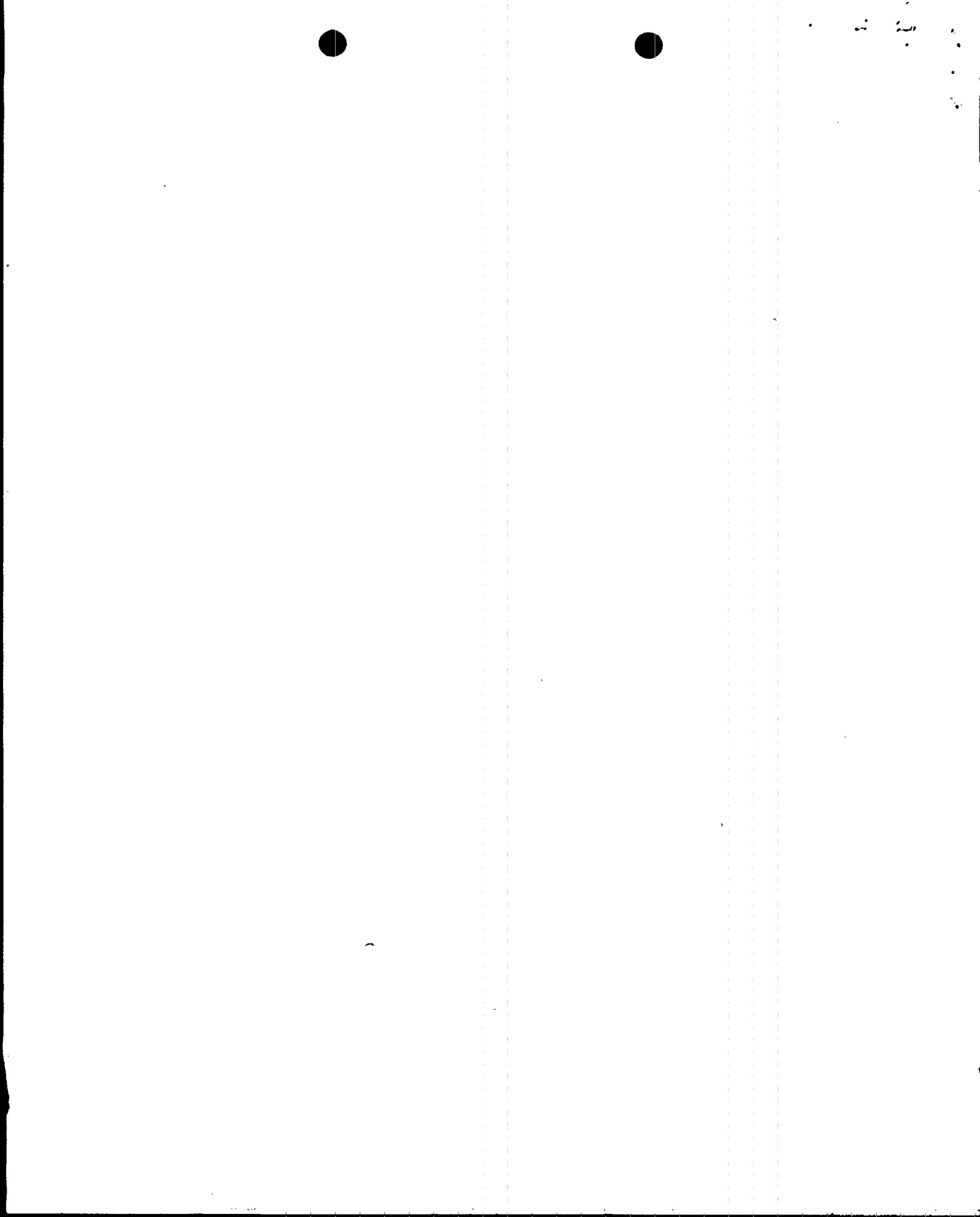
The Licensee will produce the manual used in the FPL's course in radiological protection. A training film used in connection with this course will also be made available for viewing at FPL's General Offices at 9250 W. Flagler St., Miami, Florida, upon reasonable notice, during normal business hours.

Request No. 2

FPL administers five different versions of the same comprehensive examination given in connection with FPL's course in radiological protection. In order to prevent the possibility of disclosure of all five versions to individuals who might take the examination, the Licensee will produce a copy of a version of the examination.

Request No. 3

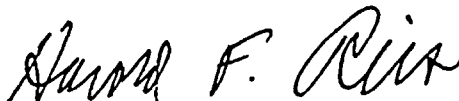
The Licensee will permit the Intervenor to view the 1/2" = 1'0" scale models of the Turkey Point containment and steam generator internals. Due to the size of the models, it is impracticable to transport them to the offices of the Intervenor's attorney. Consequently, the Licensee will permit the Intervenor to view these models, upon reasonable notice, during normal business hours, at the current location of the models at the Turkey Point site.



III. Location of Production

As requested by the Intervenor, the Licensee will produce the above identified documents at the office of the Intervenor's attorney, with the exceptions noted above.

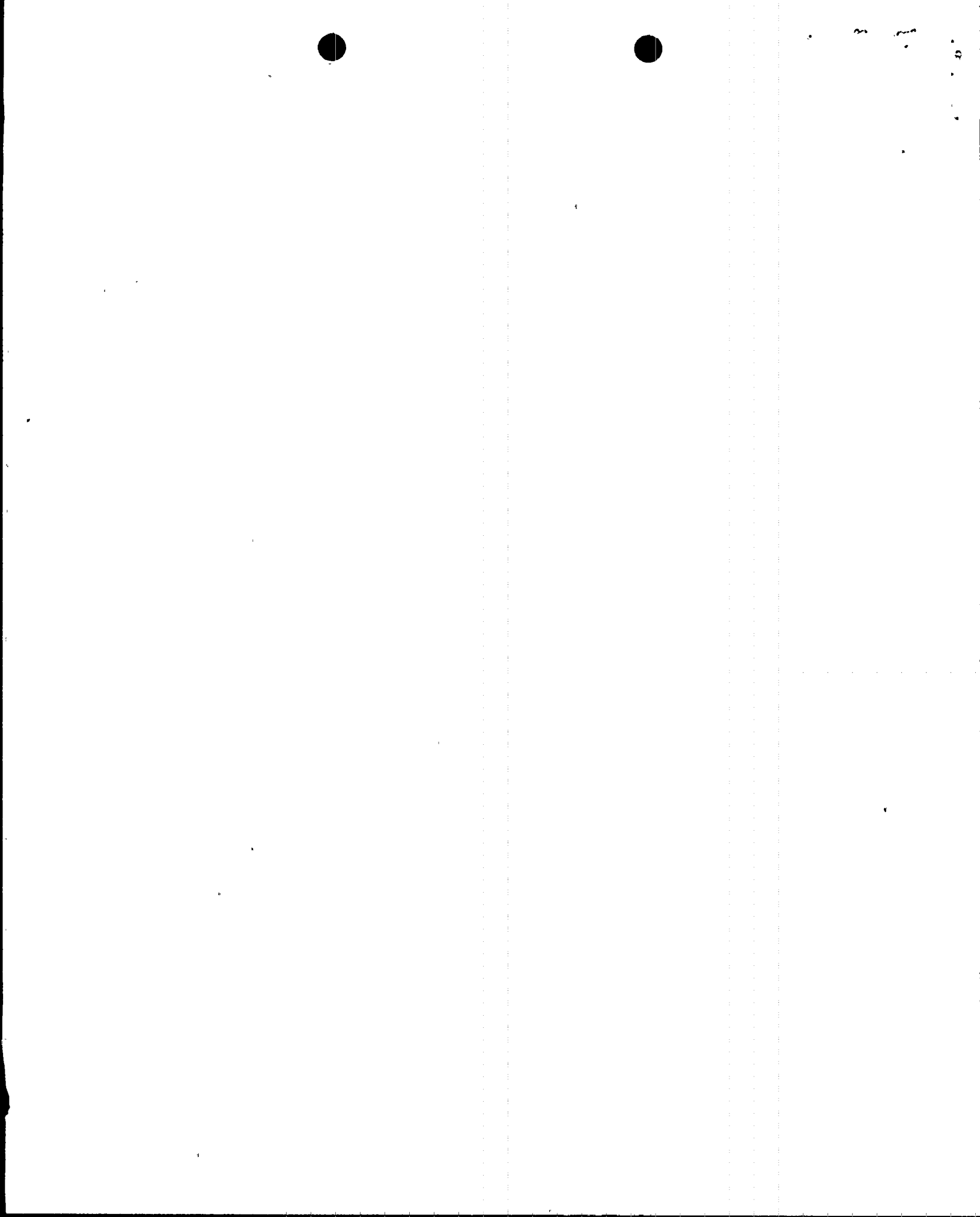
Respectfully submitted,



---

Harold F. Reis  
Steven P. Frantz  
LOWENSTEIN, NEWMAN, REIS & AXELRAD  
1025 Connecticut Ave., N.W.  
Washington, D.C. 20036  
Telephone: (202) 862-8400

Dated: April 22, 1981





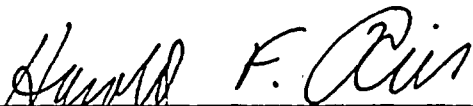
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. 50-250
	)	50-251
FLORIDA POWER AND LIGHT COMPANY	)	
(Turkey Point Nuclear	)	(Proposed Amendments to
Generating Unit Nos. 3 and 4)	)	Facility Operating Licenses
	)	to Permit Steam Generator
	)	Repair)

CERTIFICATE OF SERVICE

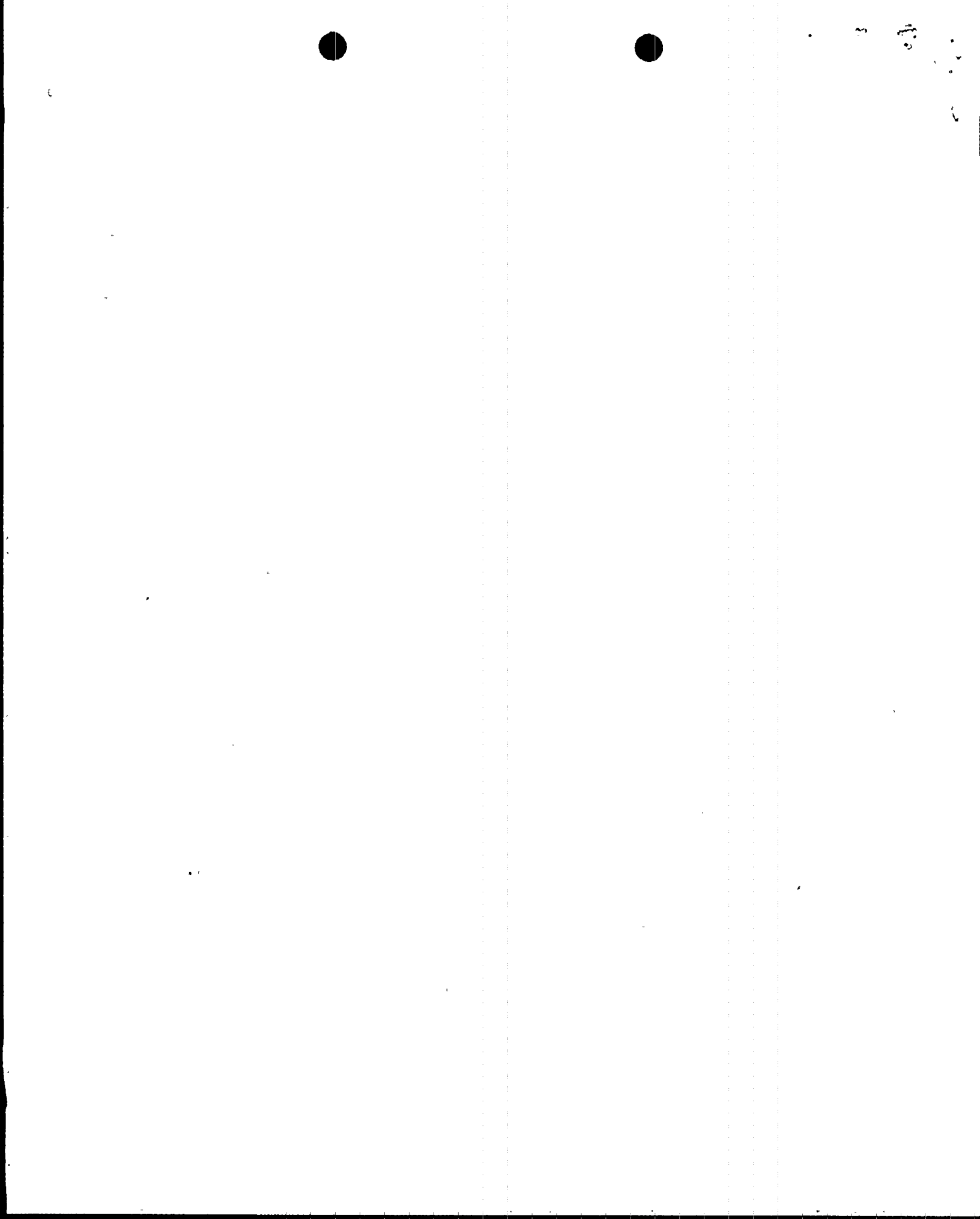
I HEREBY CERTIFY THAT copies of the foregoing "Licensee's Response to Intervenor's Discovery Requests" was served on the individuals whose names appear on the attached service list by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below. Additional service by hand or courier was made upon the individuals next to whose name an asterisk (\*) appears.

  
\_\_\_\_\_  
Harold F. Reis

Lowenstein, Newman, Reis & Axelrad  
1025 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
Telephone: (202) 862-8410

April 22, 1981

Attachment



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. 50-250
	)	50-251
FLORIDA POWER AND LIGHT COMPANY	)	
(Turkey Point Nuclear	)	(Proposed Amendments to
Generating Unit Nos. 3 and 4)	)	Facility Operating Licenses
	)	to Permit Steam Generator
	)	Repair)

SERVICE LIST

\*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

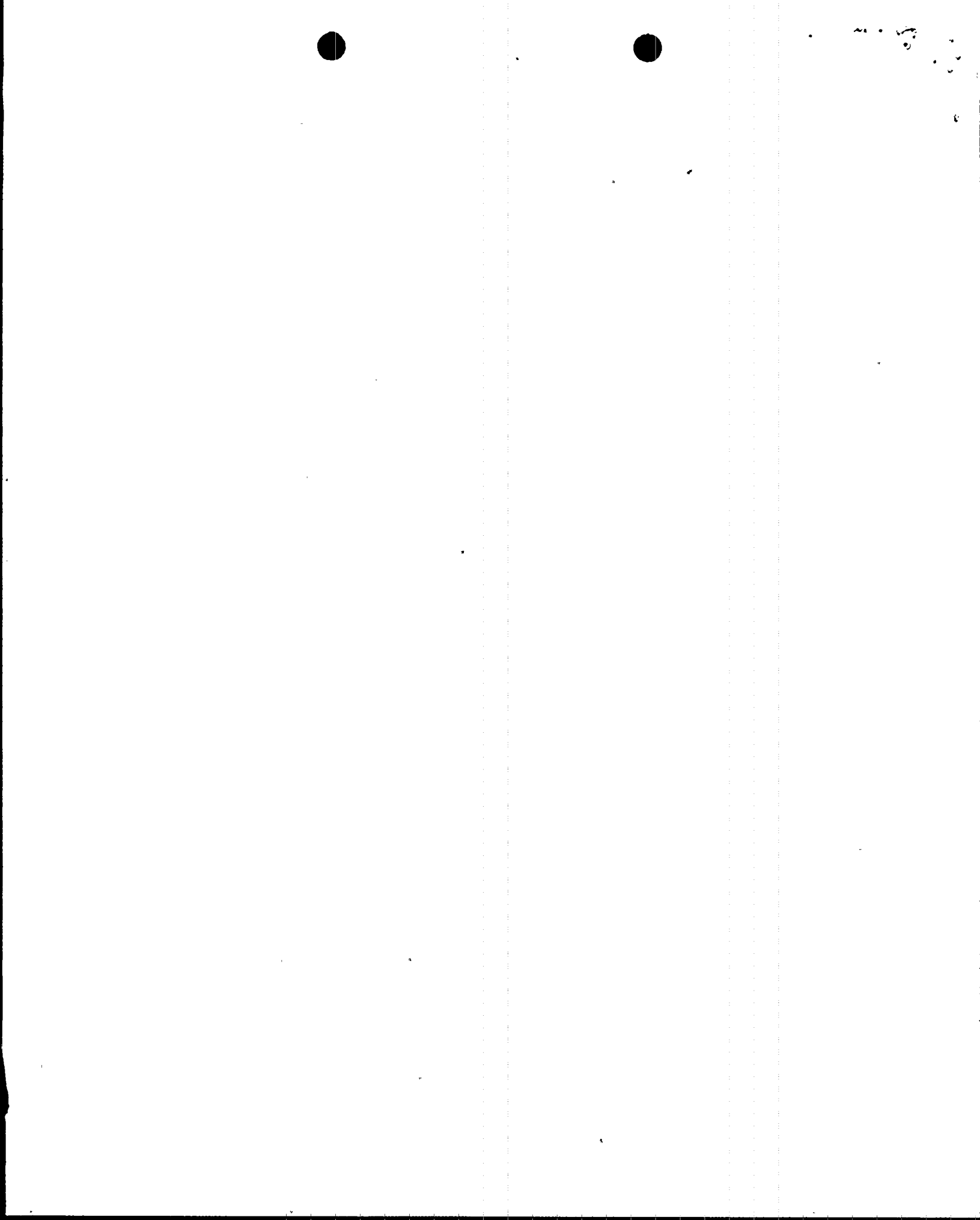
\*Dr. Oscar H. Paris, Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Mark P. Oncavage  
12200 S.W. 110th Avenue  
Miami, Florida 33176

Norman A. Coll, Esq.  
Steel, Hector & Davis  
Co-counsel for Licensee  
1400 Southeast First National Bank Building  
Miami, Florida 33131

\*Steven C. Goldberg, Esq.  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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



Service List  
Page Two

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

\*Burt Saunders, Esq.  
Assistant Dade County Attorney  
1626 Dade County Courthouse  
Miami, Florida 33130

\*Neil Chonin, Esq.  
1400 AmeriFirst Building  
One Southeast Third Avenue  
Miami, Florida 33131

\*Henry H. Harnage, Esq.  
Peninsula Federal Building  
10th Floor  
200 S.E. First Street  
Miami, Florida 33131

April 22, 1981

\*Additional Service by Hand or Courier

