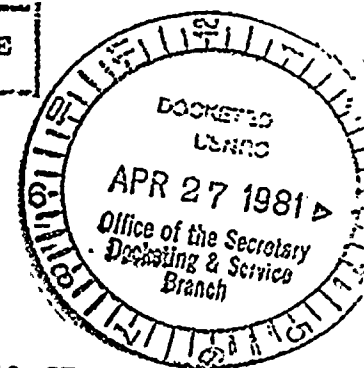


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of : Docket Nos.: 50-250-SP  
50-251-SP

FLORIDA POWER AND LIGHT COMPANY : (Proposed Amendments to Facility  
Operating License to Permit  
(Turkey Point Nuclear Generating : Steam Generator Repairs)  
Units Nos.: 3 and 4)

AFFIDAVIT OF NEIL CHONIN

I, Neil Chonin, being duly sworn, state as follows:

1. That on April 10, 1981, Licensee served Motions for Summary Disposition of Contentions 3, 6, and 8 on Intervenor.

2. That attached to these Motions were the following Affidavits:

1. Contention 8
  - A. Affidavit of Harvey Story
2. Contention 3 and 6
  - A. Affidavit of Walter A. Roger

3. That the Staff on March 26, 1981, served a Motion for Summary Disposition of Contentions 2 and 6 on the Intervenor. The Board by an Order dated April 7, 1981, gave the Intervenor until 10 days from the Site Inspection to respond.

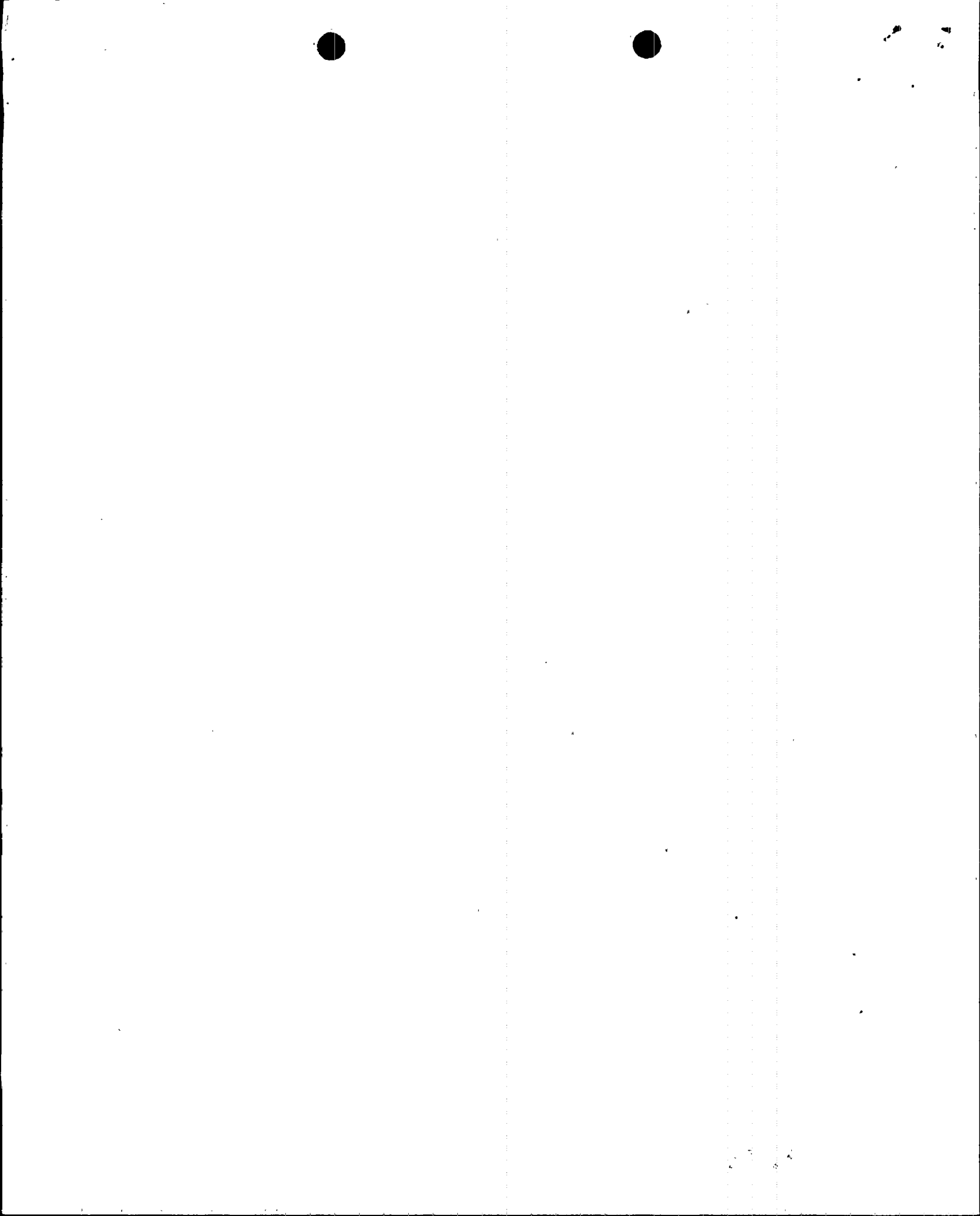
4. That the Intervenor will be conducting his site inspection on April 18, 1981, making a response due on April 28, 1981, (unless samples exceed the limits of 10 CFR Part 30 and the technical specification of FPL OL. And than the time to respond will be 10 days after receipt of the laboratory results).

5. That on April 14, 1981, the Intervenor served a Request for Production on the Licensee a copy of which is attached.

6. That on April 15, 1981, the Intervenor served a Request for Production on the Staff and the Licensee, copies of which are attached.

7. That the Intervenor's time to respond to the Motions for Summary Disposition prevents the Intervenor from completing its discovery and it would be manifestly unjust to provide a cut off date of discovery.

810504 0474



April 15th and a Summary Disposition response cut off prior to the time discovery is completed.

DATED THIS 15th day of April, 1981.

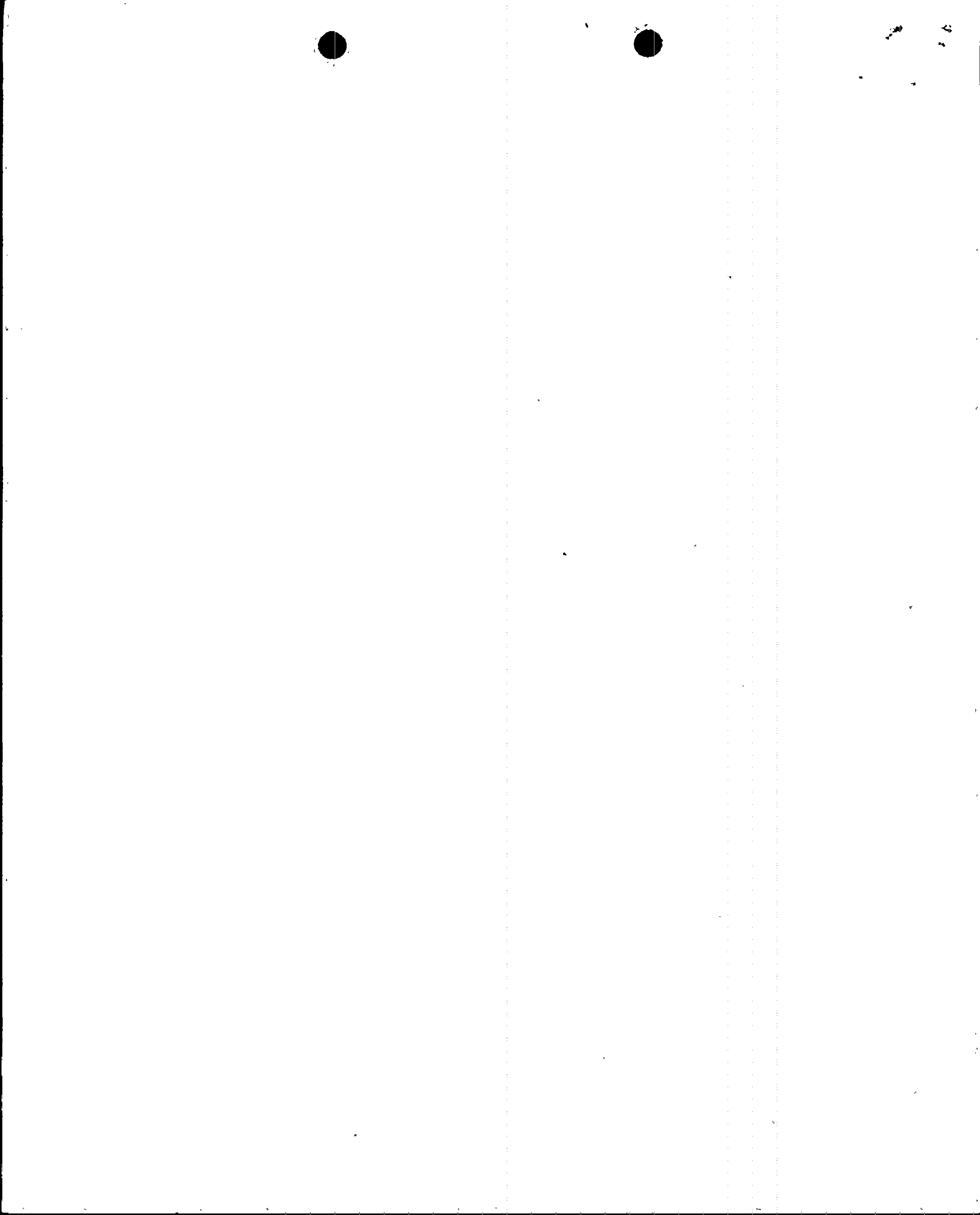
Neil Chonin  
NEIL CHONIN

SWORN TO AND SUBSCRIBED  
before me this 15th day  
of April, 1981.

Carol S. Warden  
NOTARY PUBLIC, State of Florida  
at Large

My commission expires:

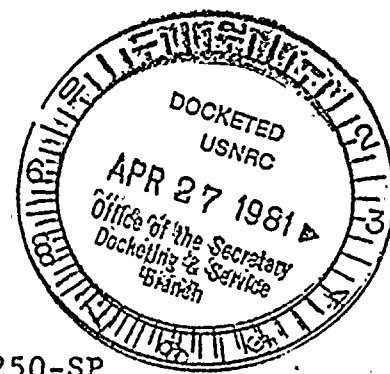
NOTARY PUBLIC STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES MAY 31 1983  
EC 105 INK GENERAL INS. & SEWING



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 AND LIGHT COMPANY : (Proposed Amendments to Facility  
: Operating License to Permit  
(Turkey Point Nuclear Generating : Steam Generator Repairs)  
Units Nos.: 3 and 4)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Intervenor's Motion to Continue or Deny Summary Disposition; Requests to Produce to both the Staff and the Licensee in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 15th day of April, 1981.

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

Harold F. Reis, Esq.  
Steven P. Frantz, Esq.  
Lowenstein, Newman, Reis & Axelrad  
1025 Connecticut Avenue, N.W.  
Washington, D. C. 20036

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

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

Henry H. Harnage, Esq.  
Peninsula Federal Building  
10th Floor  
200 S. E. 1st Street  
Miami, Florida 33131

Norman A. Coll, Esq.  
STEEL, HECTOR & DAVIS  
Co-Counsel for Licensee  
1400 S. E. 1st National Bank Bldg.  
Miami, Florida 33131

  
\_\_\_\_\_  
NEIL CHONIN  
Counsel for Intervenor

Handwritten notes and markings in the top right corner.

