

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)

STATEMENT OF GENUINE
ISSUE OF FACT

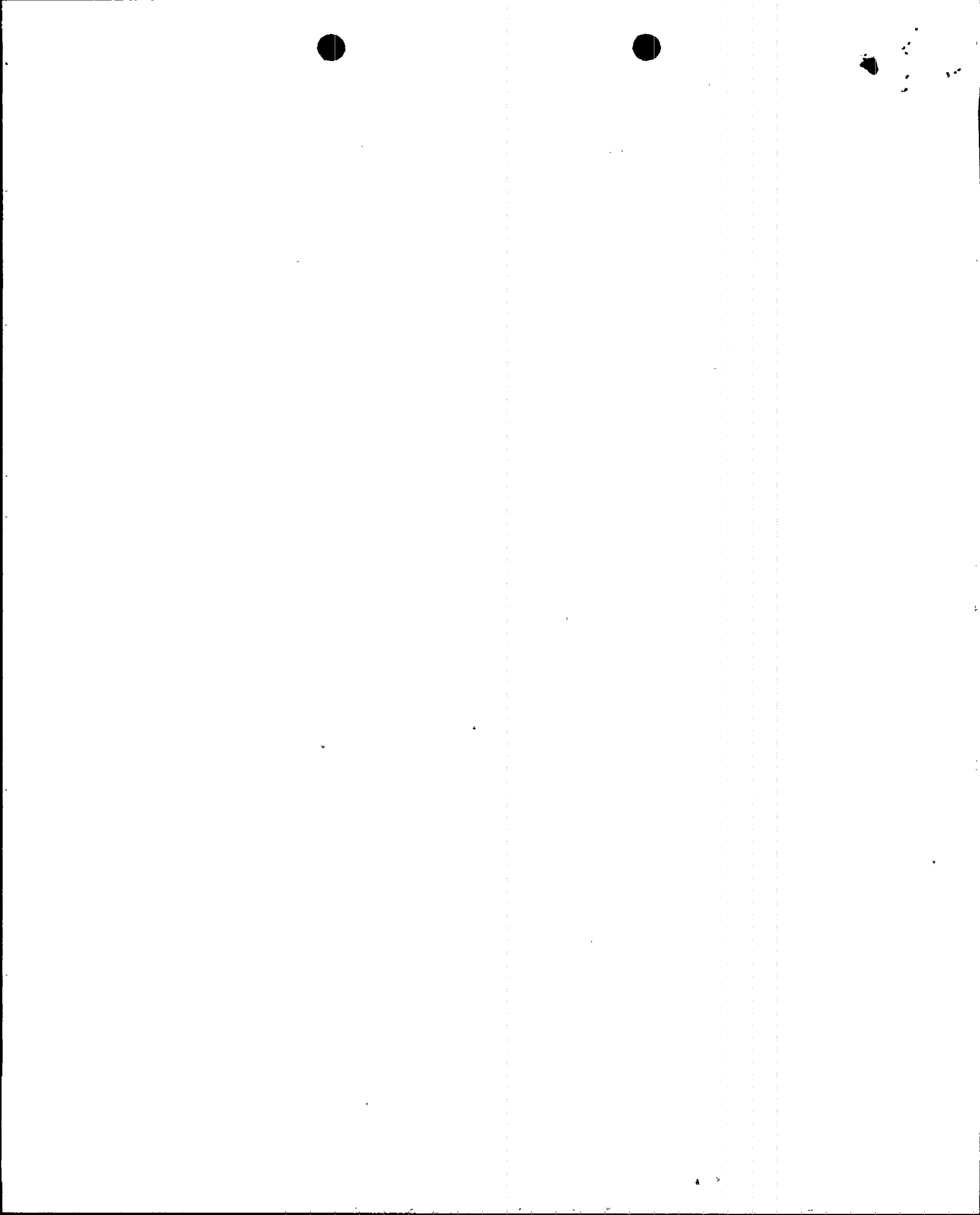
Intervenor, Mark P. Oncavage, states that there exists a genuine issue of material fact concerning:

1. Whether the Final Environmental Statement adequately addresses the alternatives of derating, conservation and solar power.
2. Whether the repairs will result in radioactive releases to unrestricted areas as a result of the storage of radioactive waste produced during the repairs combined with hurricanes.

DATED: May 19, 1981.

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By Kathleen Phillips
Neil Chonin



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the
Answer Opposing the Motion for Summary Judgment and Statement of
Genuine Issue of Fact was mailed on this the 19th day of May,
1981, to the following addresses:

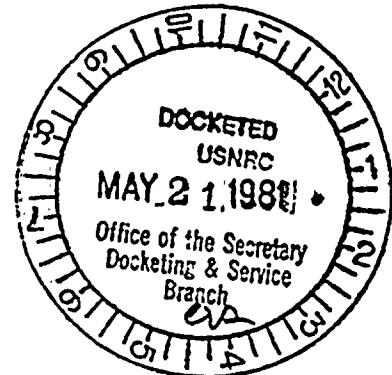
Marshall E. Miller, Esq. Administrative Judge
Chairman, Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

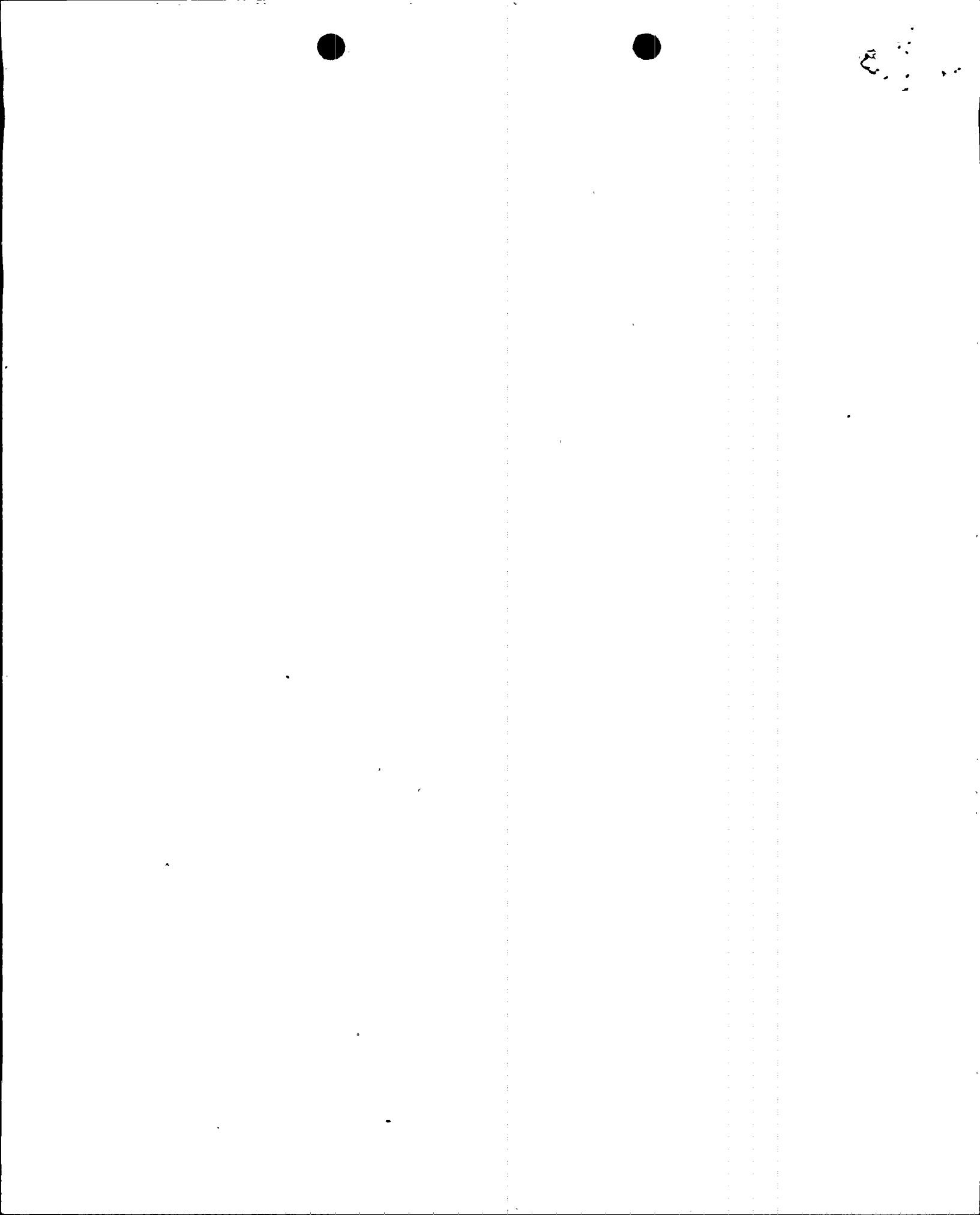
Dr. Emmeth A. Luebke, Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

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U. S. Nuclear Regulatory Commission
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Docketing and Service Section
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