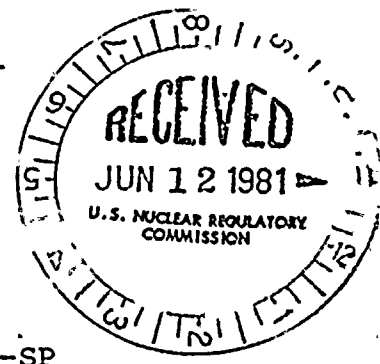


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

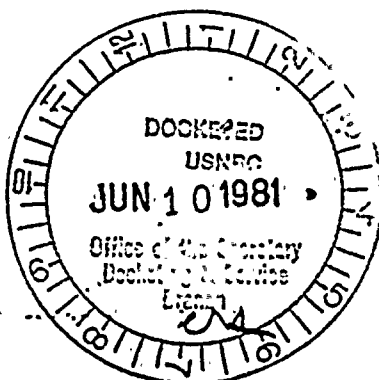
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of)	Docket Nos. 50-250-SP
)	50-251-SP
FLORIDA POWER & LIGHT COMPANY)	(Proposed Amendments to
)	Facility Operating License
(Turkey Point Nuclear Generating)	to Permit Steam Generator
Units Nos. 3 and 4))	Repairs)

Response to Motion for Protective Order

The Board has requested that all (emphasis added) parties furnish reasonably detailed and concrete information on the matters of solid wastes, their storage on site in drums, or their transportation or other disposition. The Intervenor assumes that he is still a party to this waste disposal issue. The Intervenor cannot state his position on what action the Board should take unless reasonable discovery relative to this issue is allowed. The Memorandum and Order of May 28, 1981, specifically kept the record open on the subject of solid waste. The Intervenor is entitled to pursue discovery by deposition. The Licensee is the only party that has the information concerning what is to be done with the solid waste. This information is relevant to the question of a possible license amendment condition. The Motion for Protective Order should be denied.

Dated this the 8th day of June, 1981.



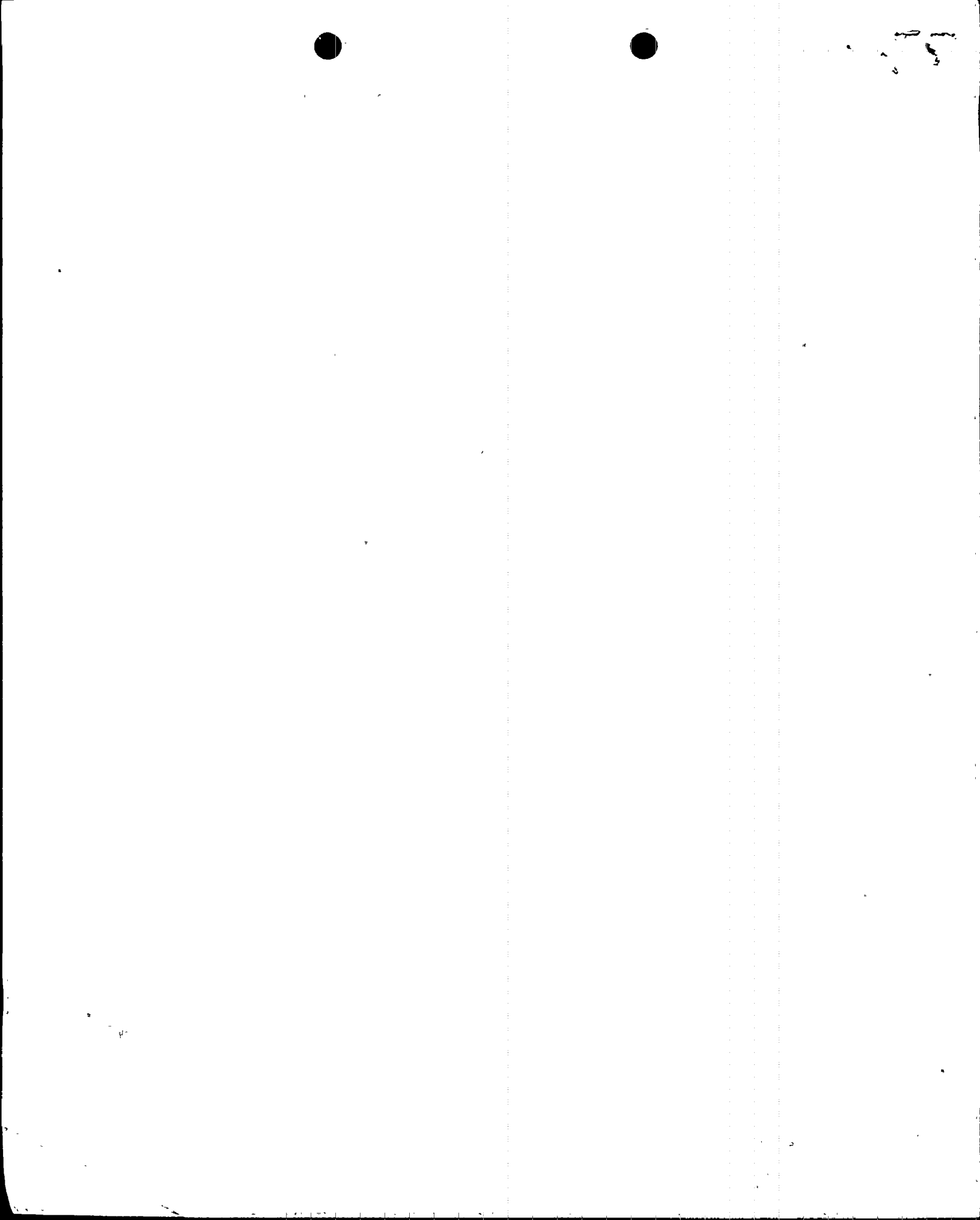
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By

Neil Chonin
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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 Generating)	Facility Operating License
Units Nos. 3 and 4))	to Permit Steam Generator
)	Repairs)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of
Response to Motion for Protective Order was mailed on this
the 8th day of June, 1981, to the following addresses:

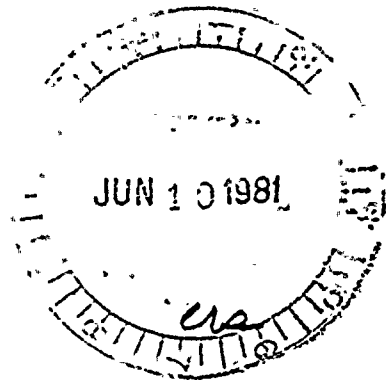
Marshall E. Miller, Esq. Administrative Judge
Chairman, Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

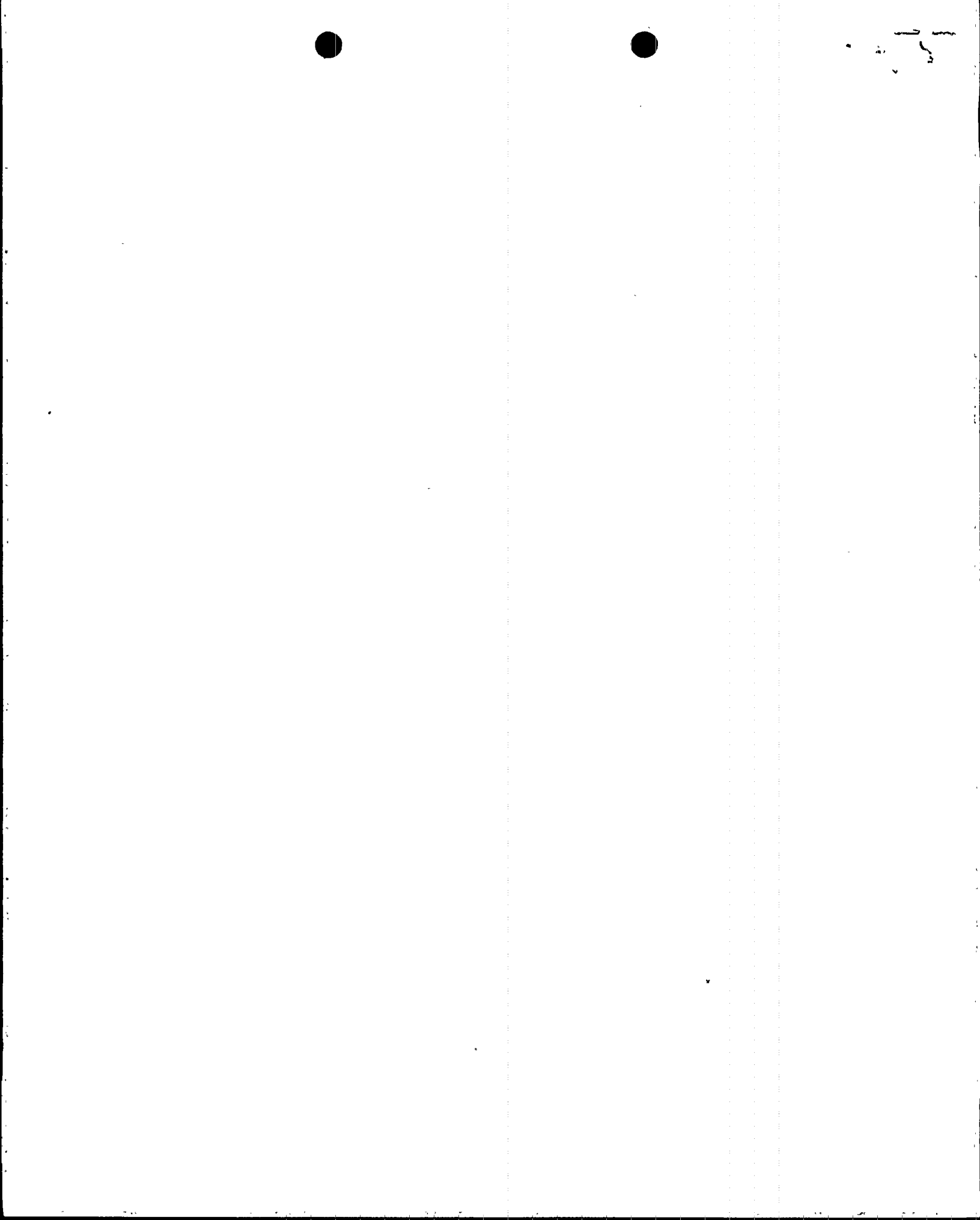
Dr. Emmeth A. Luebke, Administrative Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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