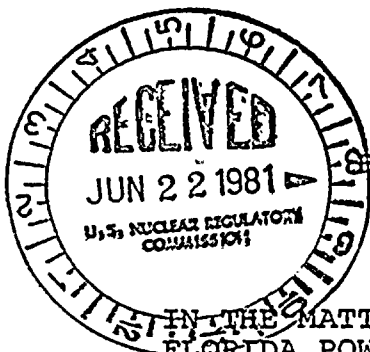
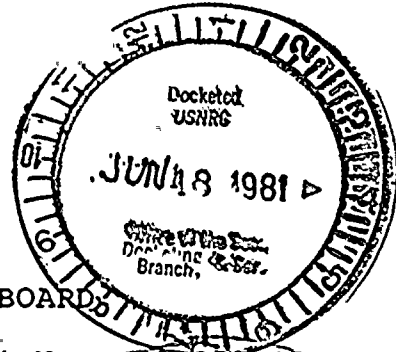


6/15/81



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-250-SP
50-251-SP

| | | |
|----------------------------------|---|----------------------------|
| IN THE MATTER OF |) | |
| FLORIDA POWER & LIGHT COMPANY |) | (Proposed Amendments to |
| (Turkey Point Nuclear Generating |) | Facility Operating License |
| Units Nos. 3 and 4) |) | to Permit Steam Generator |
| |) | Repairs) |

POSITION OF INTERVENOR, METROPOLITAN
DADE COUNTY, REGARDING WHAT ACTION
THE BOARD SHOULD TAKE IN REFERENCE
TO SOLID WASTE RESULTING FROM STEAM
GENERATOR REPAIRS AT TURKEY POINT

Intervenor, METROPOLITAN DADE COUNTY, files these
comments pursuant to the Memorandum and Order of the Nuclear
Regulatory Commission (NRC) entered on May 28, 1981.

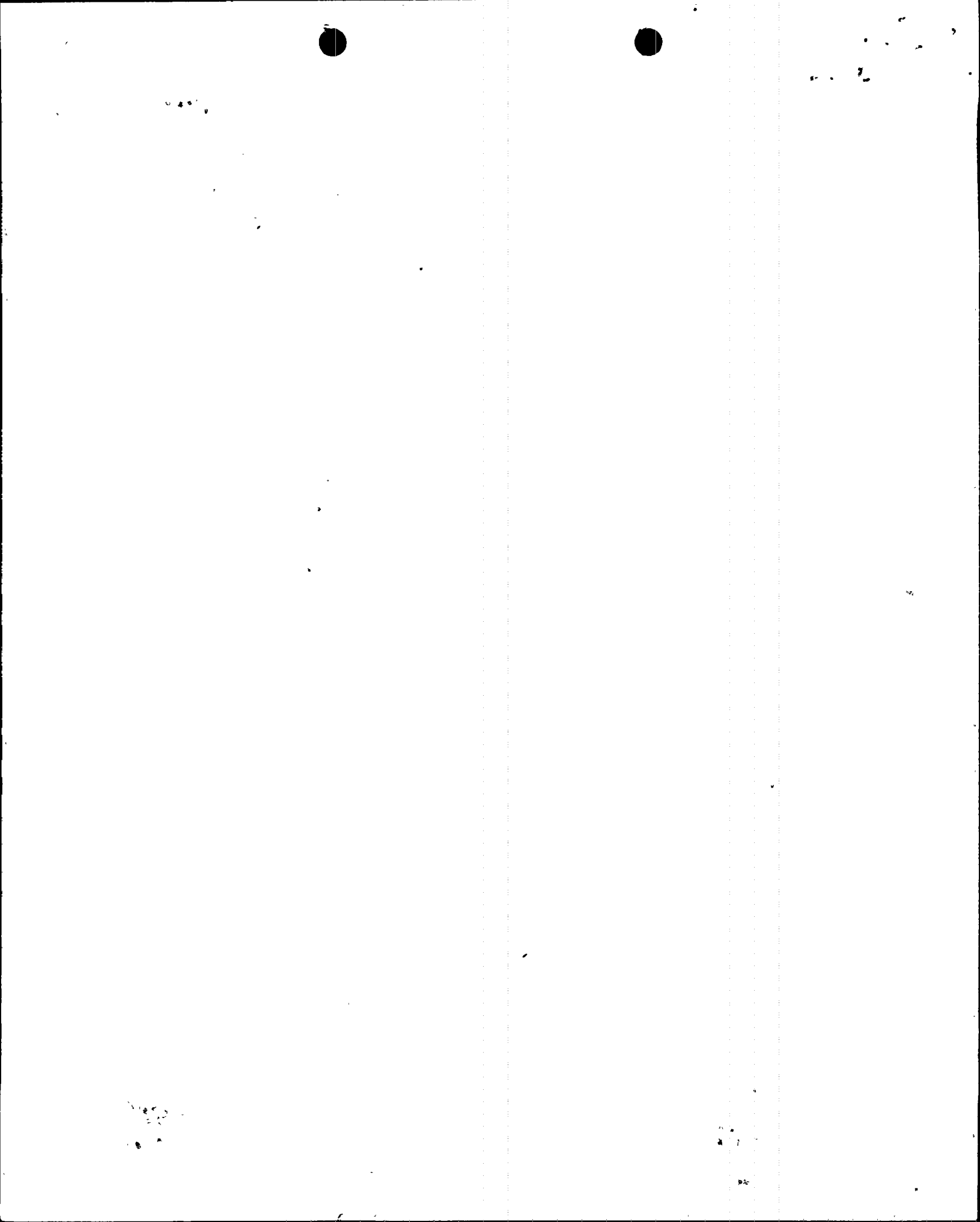
1. A review of the documentation and pleadings reveals
a lack of specific detailed information concerning the handling,
storage, transportation or other possible disposition to be made
of low level waste to be generated at the Turkey Point Facility
during the proposed repair project.

2. Florida Power & Light Company has assembled a
project group to initiate a study concerning the feasibility
of employing high technology volume reduction equipment (e.g.
incinerators). Are there any initial results from the study?

3. In addition to the employment of high technology
volume reduction, what measures does Florida Power & Light Company
intend to take in order to handle and store low level waste

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pending final disposition of the material.

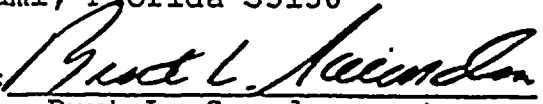
4. The NRC retains jurisdiction over the radioactive solid waste issues since the record is not sufficiently developed to enable the NRC to make a final ruling. According to the Order of May 28, 1981, dealing with the storage on-site of low level solid waste:

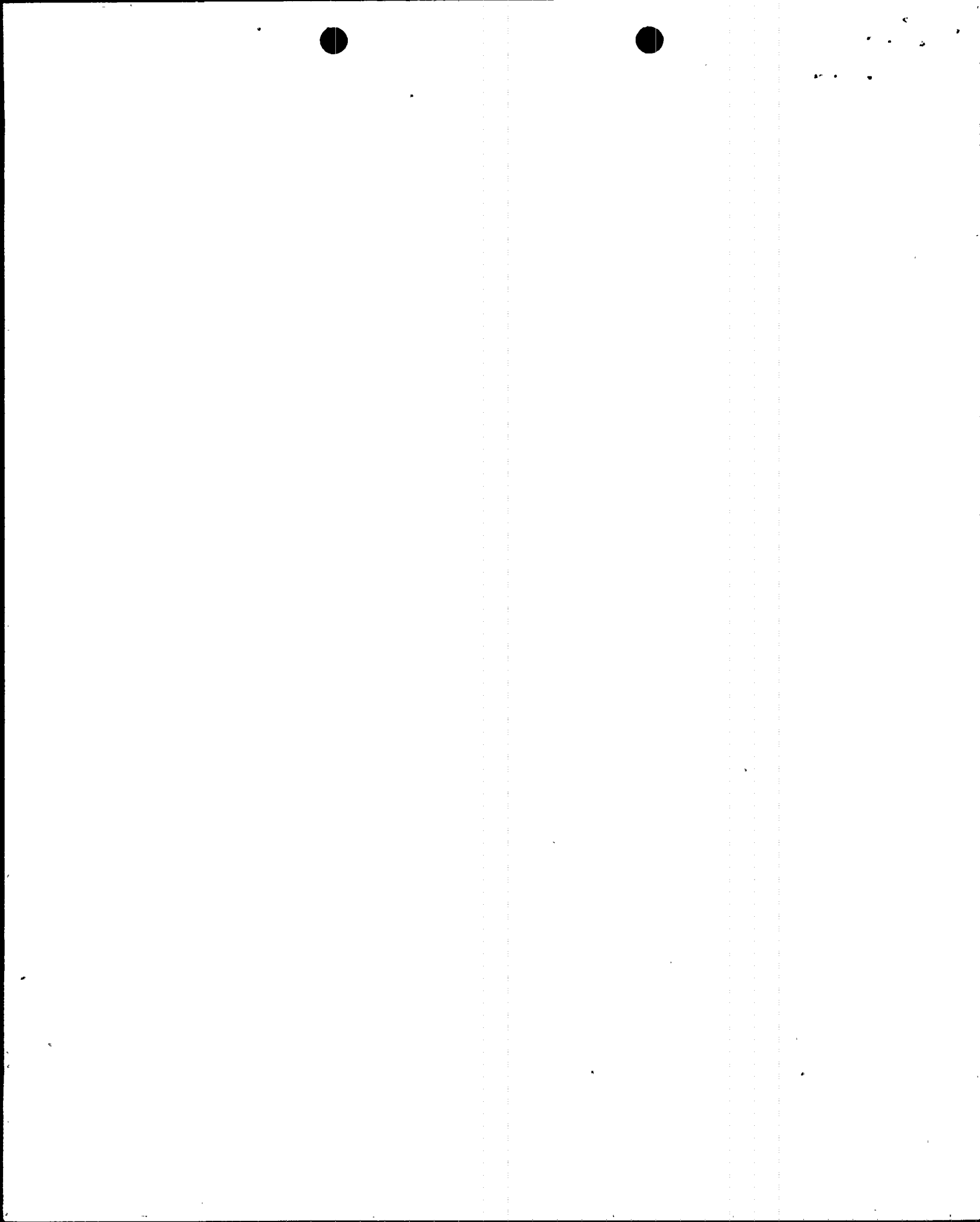
The lack of adequate record on the subject is probably attributable to the short time available to develop Contention 4B and the underlying data.

Intervenor, METROPOLITAN DADE COUNTY, would request that data be developed and that the record be completed concerning the storage of low level radioactive waste generated by Florida Power & Light during the repair project at Turkey Point. The development of this data and the record is of critical importance to Intervenor in that the storage of low level waste at Turkey Point will have long-lasting impacts upon the local environment.

WHEREFORE, Intervenor, METROPOLITAN DADE COUNTY, requests that detailed information be developed and made a part of the record herein in reference to the handling, storage; transportation or other disposition to be made of low level solid waste that may be produced at the Turkey Point facility during the proposed steam generator repair project.

ROBERT A. GINSBURG
Dade County Attorney
1626 Dade County Courthouse
Miami, Florida 33130

BY: 
Burt L. Saunders
Assistant County Attorney



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-250-SP
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| IN THE MATTER OF |) | |
| FLORIDA POWER & LIGHT COMPANY |) | |
| (Turkey Point Nuclear Generating |) | (Proposed Amendments to |
| Units Nos. 3 and 4) |) | Facility Operating License |
| |) | to Permit Steam Generator |
| |) | Repairs) |

CERTIFICATE OF SERVICE

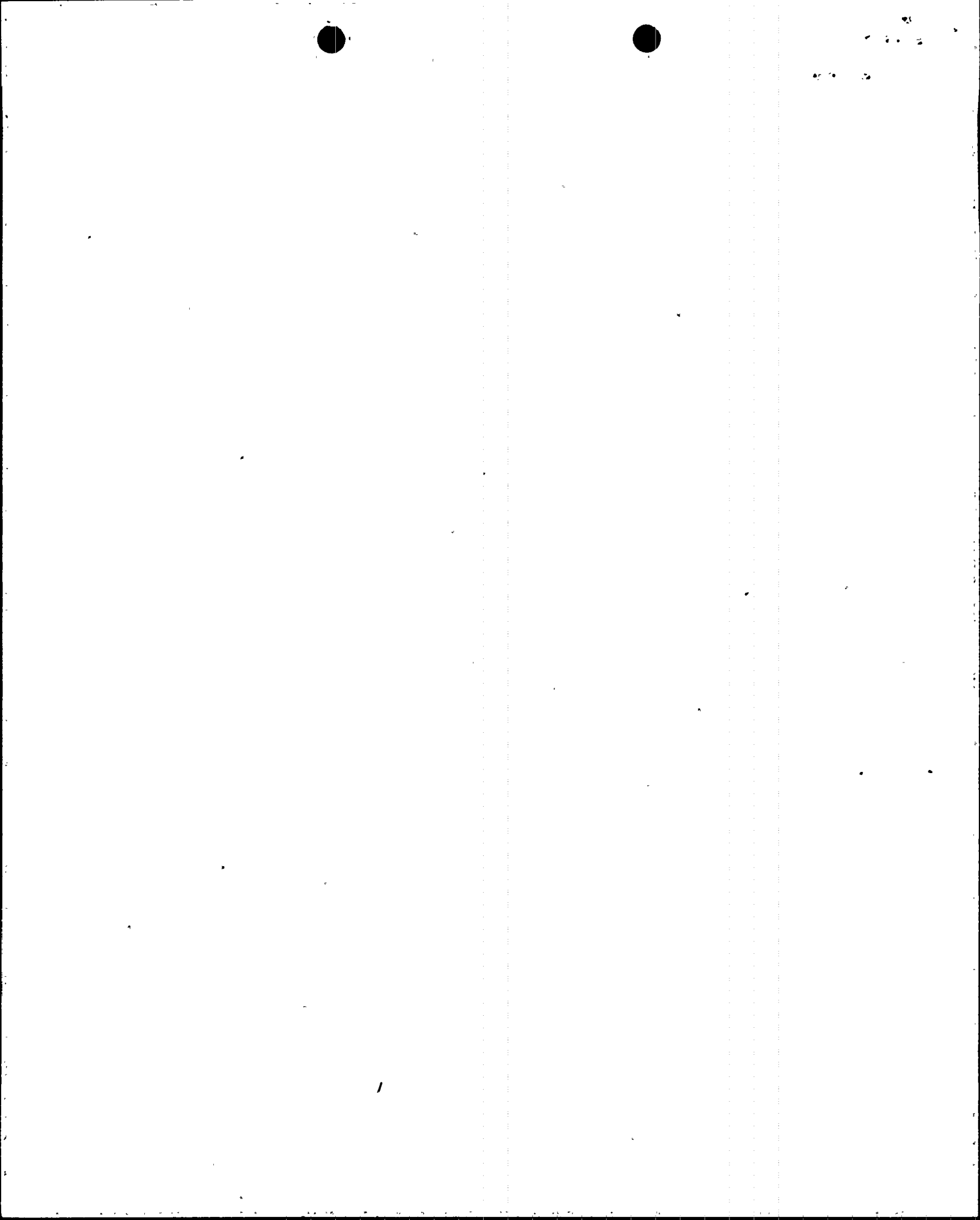
I HEREBY CERTIFY that a copy of the foregoing Position of Intervenor, METROPOLITAN DADE COUNTY, Regarding What Action the Board Should Take in Reference to Solid Waste Resulting from Steam Generator Repairs at Turkey Point was served on the following by deposit in the United States Mail, first class, property stamped and addressed, on the date shown below:

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
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June 15, 1981

