

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

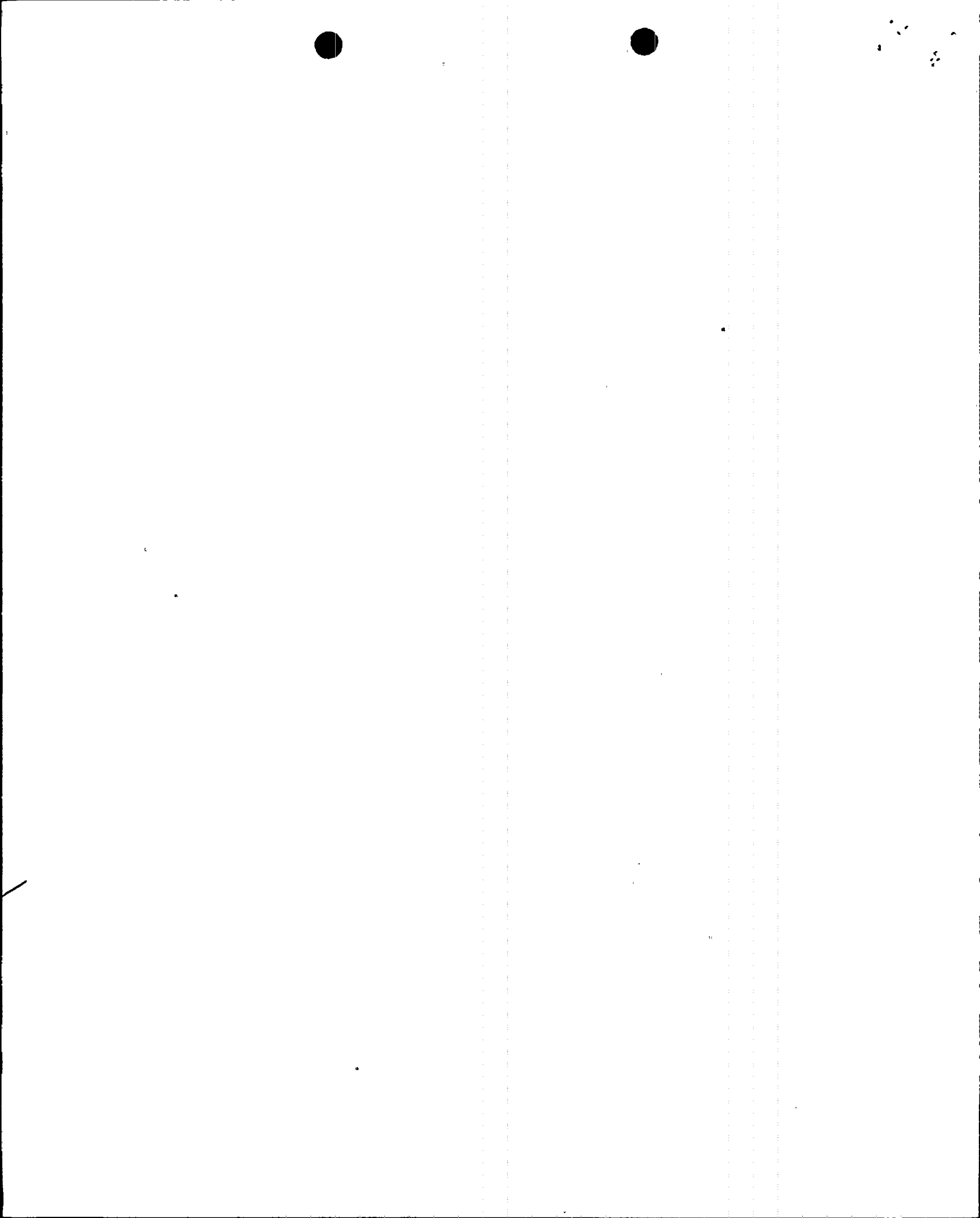
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF ALAN J. GOULD

My name is Alan J. Gould. My business address is 9250 West Flagler Street, Miami, Florida 33152. I am employed by Florida Power & Light Company (FPL) as a Power Resources Radwaste and Radiochemistry Specialist. A statement of my educational and professional qualifications has previously been furnished to the Board and is attached to my affidavit of June 12, 1981.

In my affidavit of June 12, 1981, I addressed the Licensing Board's Memorandum and Order of May 28, 1981, which directed the parties to file detailed information concerning the handling, storage, transportation or other disposition to be made of low-level solid waste that may be produced at the Turkey Point facility as a result of the proposed steam generator repairs.



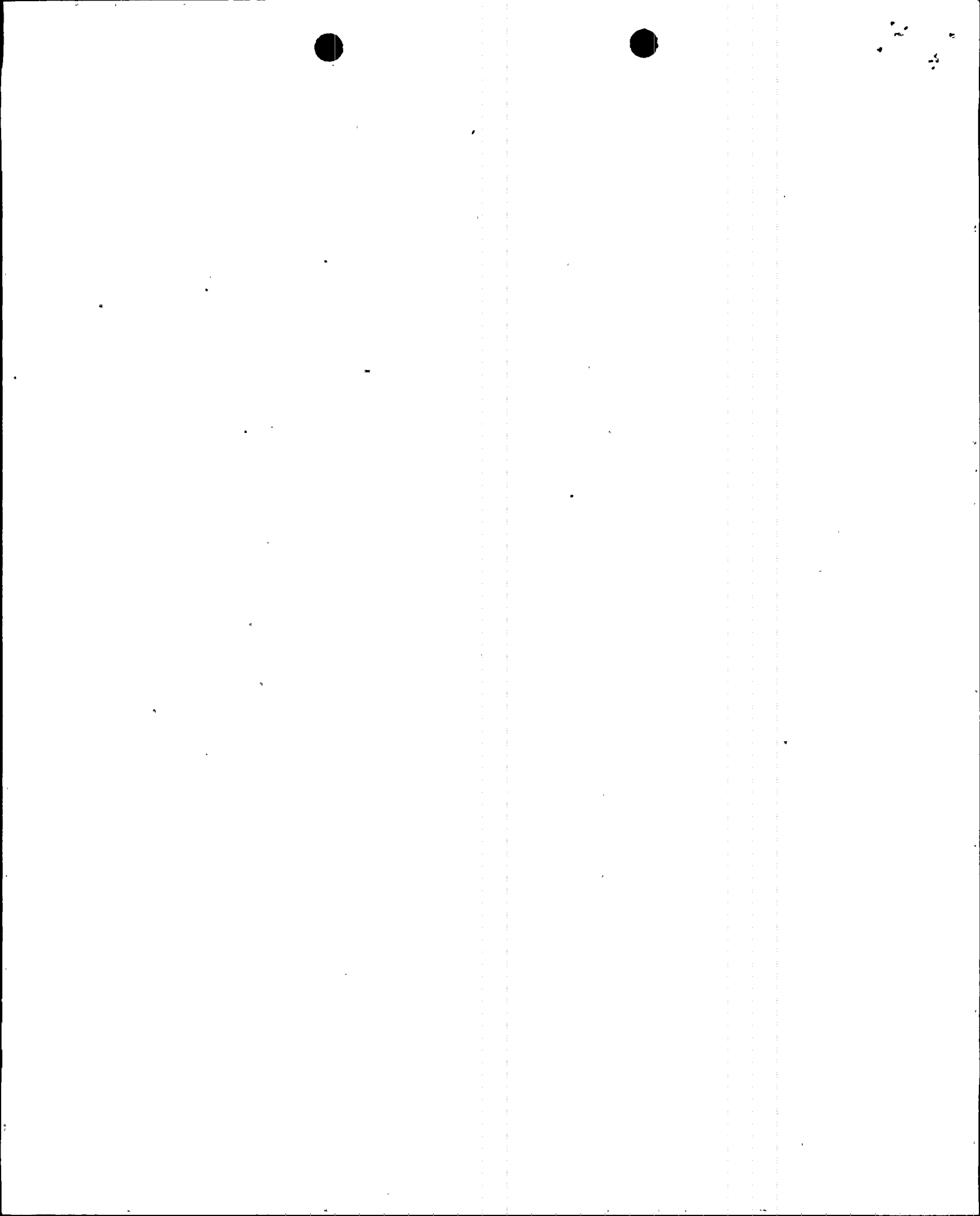
I have reviewed the Application for Stay of Final Order dated June 27, 1981, filed by Intervenor, particularly Paragraphs 8, 11 and 14, and the accompanying affidavit of Douglas King dated June 27, 1981, particularly Paragraphs 5, 6, 7 and 8.

In that affidavit, Mr. King makes estimates of quantities of certain low-level solid radioactive waste generated during the repairs resulting from processing of the primary coolant, initial decontamination of the containment building, and decontamination of the channel head and divider plate areas of each steam generator lower assembly (SGLA). I do not agree with the values which he has estimated. For example, although he estimates that 270 Curies of low-level solid radioactive waste will result from processing of the primary coolant from a single unit, based upon NUREG CR/1595, PNL 3454, Page 40 (King Affidavit, Paragraph 5), that reference only consists of a table which does not contain the value of 270 Curies, and the basis for the estimate is not apparent to me. It should be noted that the processing of primary coolant is not unusual and that the volume to be processed during the repairs approximates that which is processed during a normal refueling outage. I have estimated the quantity of low-level solid radioactive waste generated from the processing of primary coolant from Unit No. 3 during the repairs to be only approximately 40 Curies. Similarly, as set forth in the Steam Generator Repair Report, Section A-49, FPL's estimate for the amount of solid radioactive waste which will be removed by decontamination of each of the six SGLA's is at most only 45 Curies per SGLA, not the 400-1000



Curies estimated by Mr. King. (King Affidavit, Paragraph 8). Consequently, I believe that Mr. King's estimates greatly overestimate the amount of solid radioactive waste resulting from these activities.

Mr. King has also apparently assumed that there is a "lack of adequate precautions in storing these wastes" (King Affidavit, Conclusion). However, in each instance, the low-level solid radioactive waste resulting from processing of the primary coolant, decontamination of the containment building, and decontamination of the channel head and divider plate areas of each SGLA will be handled as I have indicated in my previous affidavit of June 12, 1981. In summary, low-concentration low-level waste which must be retained on site will be packaged as previously described, in either LSA boxes or steel drums, and secured as described. Low-level waste with relatively high concentrations of radioactivity, which would include the residue resulting from the steam generator channel head and divider plate decontamination, and spent resin resulting from the processing of primary coolant, will be kept inside the Turkey Point Radwaste Building, or, in the case of the spent resins, either in the Turkey Point Radwaste Building or in the Turkey Point Auxiliary Building spent resin storage system prior to shipment. Both the Turkey Point Radwaste Building and the Turkey Point Auxiliary Building are designed to withstand the forces of hurricanes and tornadoes. Consequently, Mr. King's speculation regarding the possibility of an "irreversible contaminating accident" is unfounded.




My affidavit of June 12, 1981, stated that FPL was then "seeking a permit for shipment of LLW to an alternate waste disposal facility." Subsequently FPL received a permit to ship low level radioactive waste to the Low Level Waste Disposal Facility in Richland, Washington. To date FPL has disposed of more than 800 of the drums referenced as being presently on site in my June 12 affidavit, by shipment off site either to Barnwell, South Carolina or Richland, Washington. Currently FPL plans to complete shipping all of the referenced drums to a waste disposal facility by August 1, 1981. Further, FPL plans to continue to utilize the alternative of shipping low-level waste to the Richland, Washington Waste Disposal Facility, in addition to Barnwell, South Carolina, to minimize the amount of low-level waste temporarily retained at the Turkey Point site.

FURTHER AFFIANT SAYETH NOT.


Alan J. Gould

SWORN TO and SUBSCRIBED
before me this 10 day
of July, 1981.


Notary Public, State of
Florida at Large

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA
ALAN J. GOULD
JULY 1, 1981

