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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME: AUTHOR AFFILIATION
 UHRIG, R.E. Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards comparative summary for radiological environment monitoring program per NUREG-0472 & pages to revised radiological effluent Tech Specs, per 830829 meeting commitment.

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NOTES:

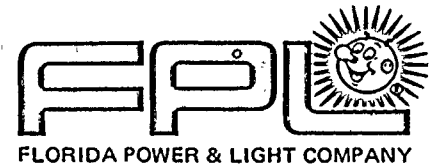
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1. The first part of the report is a summary of the work done during the year. It is a brief statement of the results of the work, and is intended to give a general impression of the progress made.

2. The second part of the report is a detailed account of the work done during the year. It is a full and complete statement of the work, and is intended to give a full and complete account of the progress made.

3. The third part of the report is a statement of the conclusions reached during the year. It is a brief statement of the results of the work, and is intended to give a general impression of the progress made.

Year	1911	1912	1913	1914	1915	1916	1917	1918	1919	1920	1921	1922	1923	1924	1925	1926	1927	1928	1929	1930	1931	1932	1933	1934	1935	1936	1937	1938	1939	1940	1941	1942	1943	1944	1945	1946	1947	1948	1949	1950	1951	1952	1953	1954	1955	1956	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100	2101	2102	2103	2104	2105	2106	2107	2108	2109	2110	2111	2112	2113	2114	2115	2116	2117	2118	2119	2120	2121	2122	2123	2124	2125	2126	2127	2128	2129	2130	2131	2132	2133	2134	2135	2136	2137	2138	2139	2140	2141	2142	2143	2144	2145	2146	2147	2148	2149	2150	2151	2152	2153	2154	2155	2156	2157	2158	2159	2160	2161	2162	2163	2164	2165	2166	2167	2168	2169	2170	2171	2172	2173	2174	2175	2176	2177	2178	2179	2180	2181	2182	2183	2184	2185	2186	2187	2188	2189	2190	2191	2192	2193	2194	2195	2196	2197	2198	2199	2200	2201	2202	2203	2204	2205	2206	2207	2208	2209	2210	2211	2212	2213	2214	2215	2216	2217	2218	2219	2220	2221	2222	2223	2224	2225	2226	2227	2228	2229	2230	2231	2232	2233	2234	2235	2236	2237	2238	2239	2240	2241	2242	2243	2244	2245	2246	2247	2248	2249	2250	2251	2252	2253	2254	2255	2256	2257	2258	2259	2260	2261	2262	2263	2264	2265	2266	2267	2268	2269	2270	2271	2272	2273	2274	2275	2276	2277	2278	2279	2280	2281	2282	2283	2284	2285	2286	2287	2288	2289	2290	2291	2292	2293	2294	2295	2296	2297	2298	2299	2300	2301	2302	2303	2304	2305	2306	2307	2308	2309	2310	2311	2312	2313	2314	2315	2316	2317	2318	2319	2320	2321	2322	2323	2324	2325	2326	2327	2328	2329	2330	2331	2332	2333	2334	2335	2336	2337	2338	2339	2340	2341	2342	2343	2344	2345	2346	2347	2348	2349	2350	2351	2352	2353	2354	2355	2356	2357	2358	2359	2360	2361	2362	2363	2364	2365	2366	2367	2368	2369	2370	2371	2372	2373	2374	2375	2376	2377	2378	2379	2380	2381	2382	2383	2384	2385	2386	2387	2388	2389	2390	2391	2392	2393	2394	2395	2396	2397	2398	2399	2400	2401	2402	2403	2404	2405	2406	2407	2408	2409	2410	2411	2412	2413	2414	2415	2416	2417	2418	2419	2420	2421	2422	2423	2424	2425	2426	2427	2428	2429	2430	2431	2432	2433	2434	2435	2436	2437	2438	2439	2440	2441	2442	2443	2444	2445	2446	2447	2448	2449	2450	2451	2452	2453	2454	2455	2456	2457	2458	2459	2460	2461	2462	2463	2464	2465	2466	2467	2468	2469	2470	2471	2472	2473	2474	2475	2476	2477	2478	2479	2480	2481	2482	2483	2484	2485	2486	2487	2488	2489	2490	2491	2492	2493	2494	2495	2496	2497	2498	2499	2500	2501	2502	2503	2504	2505	2506	2507	2508	2509	2510	2511	2512	2513	2514	2515	2516	2517	2518	2519	2520	2521	2522	2523	2524	2525	2526	2527	2528	2529	2530	2531	2532	2533	2534	2535	2536	2537	2538	2539	2540	2541	2542	2543	2544	2545	2546	2547	2548	2549	2550	2551	2552	2553	2554	2555	2556	2557	2558	2559	2560	2561	2562	2563	2564	2565	2566	2567	2568	2569	2570	2571	2572	2573	2574	2575	2576	2577	2578	2579	2580	2581	2582	2583	2584	2585	2586	2587	2588	2589	2590	2591	2592	2593	2594	2595	2596	2597	2598	2599	2600	2601	2602	2603	2604	2605	2606	2607	2608	2609	2610	2611	2612	2613	2614	2615	2616	2617	2618	2619	2620	2621	2622	2623	2624	2625	2626	2627	2628	2629	2630	2631	2632	2633	2634	2635	2636	2637	2638	2639	2640	2641	2642	2643	2644	2645	2646	2647	2648	2649	2650	2651	2652	2653	2654	2655	2656	2657	2658	2659	2660	2661	2662	2663	2664	2665	2666	2667	2668	2669	2670	2671	2672	2673	2674	2675	2676	2677	2678	2679	2680	2681	2682	2683	2684	2685	2686	2687	2688	2689	2690	2691	2692	2693	2694	2695	2696	2697	2698	2699	2700	2701	2702	2703	2704	2705	2706	2707	2708	2709	2710	2711	2712	2713	2714	2715	2716	2717	2718	2719	2720	2721	2722	2723	2724	2725	2726	2727	2728	2729	2730	2731	2732	2733	2734	2735	2736	2737	2738	2739	2740	2741	2742	2743	2744	2745	2746	2747	2748	2749	2750	2751	2752	2753	2754	2755	2756	2757	2758	2759	2760	2761	2762	2763	2764	2765	2766	2767	2768	2769	2770	2771	2772	2773	2774	2775	2776	2777	2778	2779	2780	2781	2782	2783	2784	2785	2786	2787	2788	2789	2790	2791	2792	2793	2794	2795	2796	2797	2798	2799	2800	2801	2802	2803	2804	2805	2806	2807	2808	2809	2810	2811	2812	2813	2814	2815	2816	2817	2818	2819	2820	2821	2822	2823	2824	2825	2826	2827	2828	2829	2830	2831	2832	2833	2834	2835	2836	2837	2838	2839	2840	2841	2842	2843	2844	2845	2846	2847	2848	2849	2850	2851	2852	2853	2854	2855	2856	2857	2858	2859	2860	2861	2862	2863	2864	2865	2866	2867	2868	2869	2870	2871	2872	2873	2874	2875	2876	2877	2878	2879	2880	2881	2882	2883	2884	2885	2886	2887	2888	2889	2890	2891	2892	2893	2894	2895	2896	2897	2898	2899	2900	2901	2902	2903	2904	2905	2906	2907	2908	2909	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September 26, 1983
L-83-499

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250, 50-251
Radiological Effluent
Technical Specifications

Your Messrs. C. Willis and C. Miller met with our staff on August 29, 1983 to review our submittal of Radiological Effluent Technical Specifications. Following the meeting we committed to provide:

- 1) The pages of our previous submittal containing the agreed upon changes;
- 2) The bases for our Radiological Environmental Monitoring Program, in comparison with the program guidance provided in NUREG 0472.

A preliminary table from the ODCM showing our selected sample locations is also attached to assist you in evaluating the Radiological Environmental Monitoring Program.

Please find items 1) and 2) attached. The Technical Specification pages are provided as agreed upon with a few very minor exceptions (i.e., replacement of "SPING-4" with generic description, removal of charcoal adsorber from definitions since Turkey does not use same, and changing "Containment Purge" to PURGING and VENTING, for format consistency.)

Very truly yours,

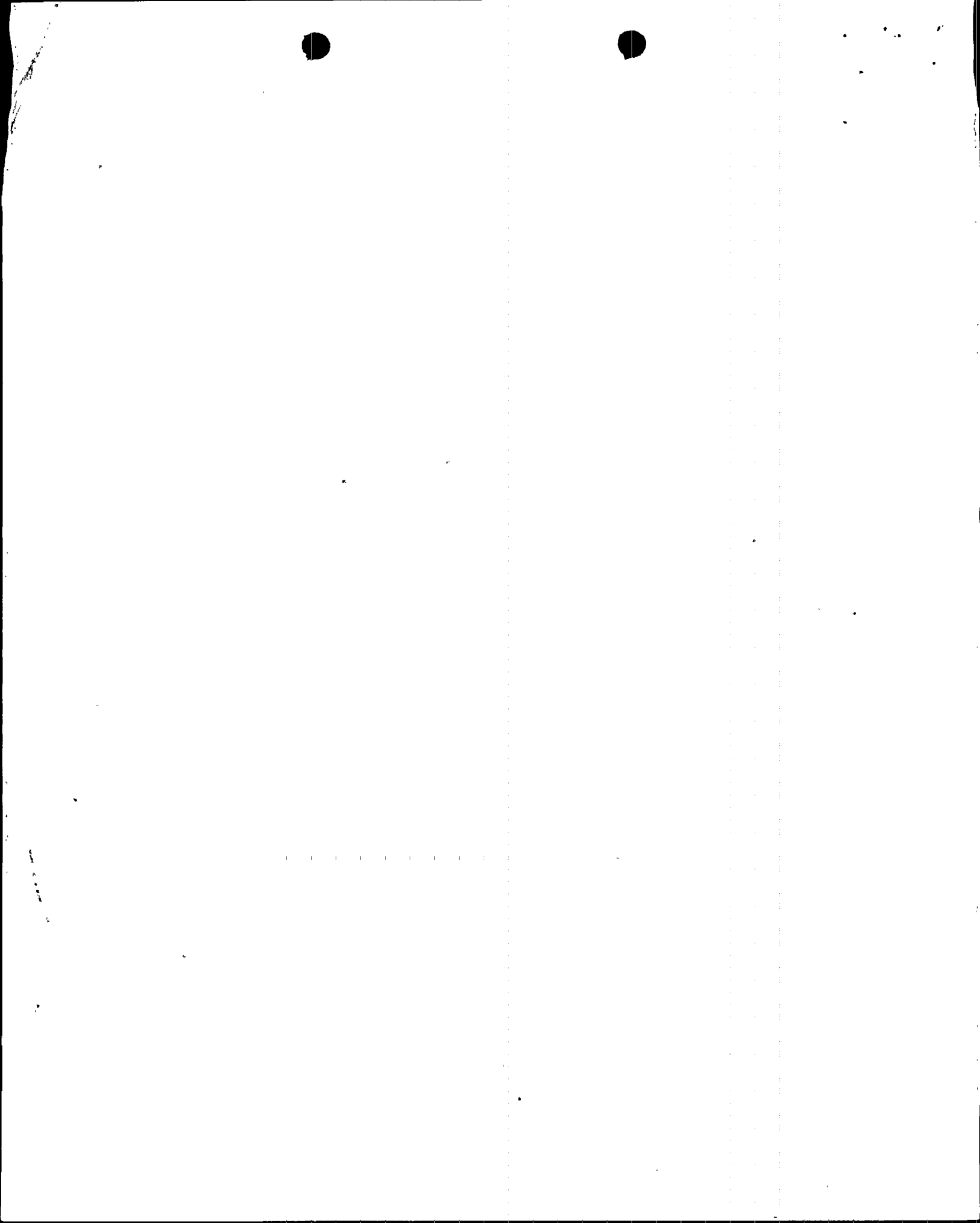
Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/JEM/js

Attachments

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire

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TURKEY POINT UNIT NOS. 3 & 4
RADIOLOGICAL ENVIRONMENTAL MONITORING
SAMPLE SELECTIONS (TABLE 4.12-1)

The objective of the proposed Turkey Point Radiological Environmental Monitoring Program is to provide measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of members of the public resulting from the station operation and to supplement the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways.

On July 11, 1983, FPL submitted a proposed amendment to the Turkey Point Unit Nos. 3 & 4 Technical Specifications (L83-402) which includes a Radiological Environmental Monitoring Program that meets this objective and was prepared using guidance issued by NRC.

Radiological environmental monitoring for the Turkey Point Plant is conducted by the Florida Department of Health and Rehabilitative Services, Environmental Radiation Control Laboratory. The monitoring program has been essentially unchanged since September, 1973. Since that time numerous environmental monitoring samples have been collected and analyzed. To date, there has been no indication that operation of the Turkey Point facility is contributing significantly to the dose to any member of the public. In consideration of this significant data base and the NRC sample selection criteria, FPL has determined that some of the samples currently required by Turkey Point Technical Specifications are no longer necessary.

The basis for FPL's proposed environmental monitoring program is as follows:

Direct Radiation

Turkey Point 3 & 4 Technical Specifications require direct radiation measurements (TLD) at 9 locations with a collection frequency of monthly.

The proposed monitoring program increases the number of surveillance locations to 21. Sample collection frequency is quarterly; however, these TLD's may be retrieved and analyzed at any time if there is a need. The proposed locations correspond to the "Ring" TLD's which have been deployed around the Turkey Point Plant by Florida Department of Health and Rehabilitative Services. Locations are specified in the Turkey Point ODCM.

NUREG 0472 specifies about 40 locations to be monitored. Since NUREG 0472 is a generic document, it applies to inland plants as well as coastal plants. FPL's Turkey Point Plant is situated along the shore of Biscayne Bay. The only land areas east (5 - 8 miles) of the facility are a series of offshore islands, the largest of which is Elliott Key. These islands are undeveloped. It is estimated there may be approximately 60 part time residents on the islands (FSAR 2.1). It is also to be noted that these islands are located in sectors of least prevalent wind direction (FSAR 2.6).

FPL has concluded that the 21 Direct Radiation Monitoring locations which we have proposed meet the intent of NUREG 0472.

Airborne

The proposed monitoring locations (5) were selected based upon the criteria contained in NUREG 0472. Since there are existing stations at Turkey Point, the proposed locations were selected from existing sample locations that most closely matched the criteria. The locations selected were:

1. 3 samples from close to 3 site boundary locations (in different sectors) of the highest calculated annual average ground-level D/Q.
 - a. Homestead Bayfront Park (T51) - NNW
 - b. Entrance Road (T58) - NW
 - c. Boy Scout Camp (T72) - WSW
2. 1 sample from the vicinity of a community having the highest calculated annual average ground-level D/Q.
 - a. The community is the Homestead Air Force Base - (T57) - NW
3. 1 sample from a control location 15 - 30 km distance and in the least prevalent wind direction.
 - a. The least prevalent wind direction is over the water. The existing control location in Miami (T64) was chosen as suitable for the control location.

Each of the above sample locations will be continuously sampled for particulates and iodines. The locations for the above samples are specified in the Turkey Point ODCM.

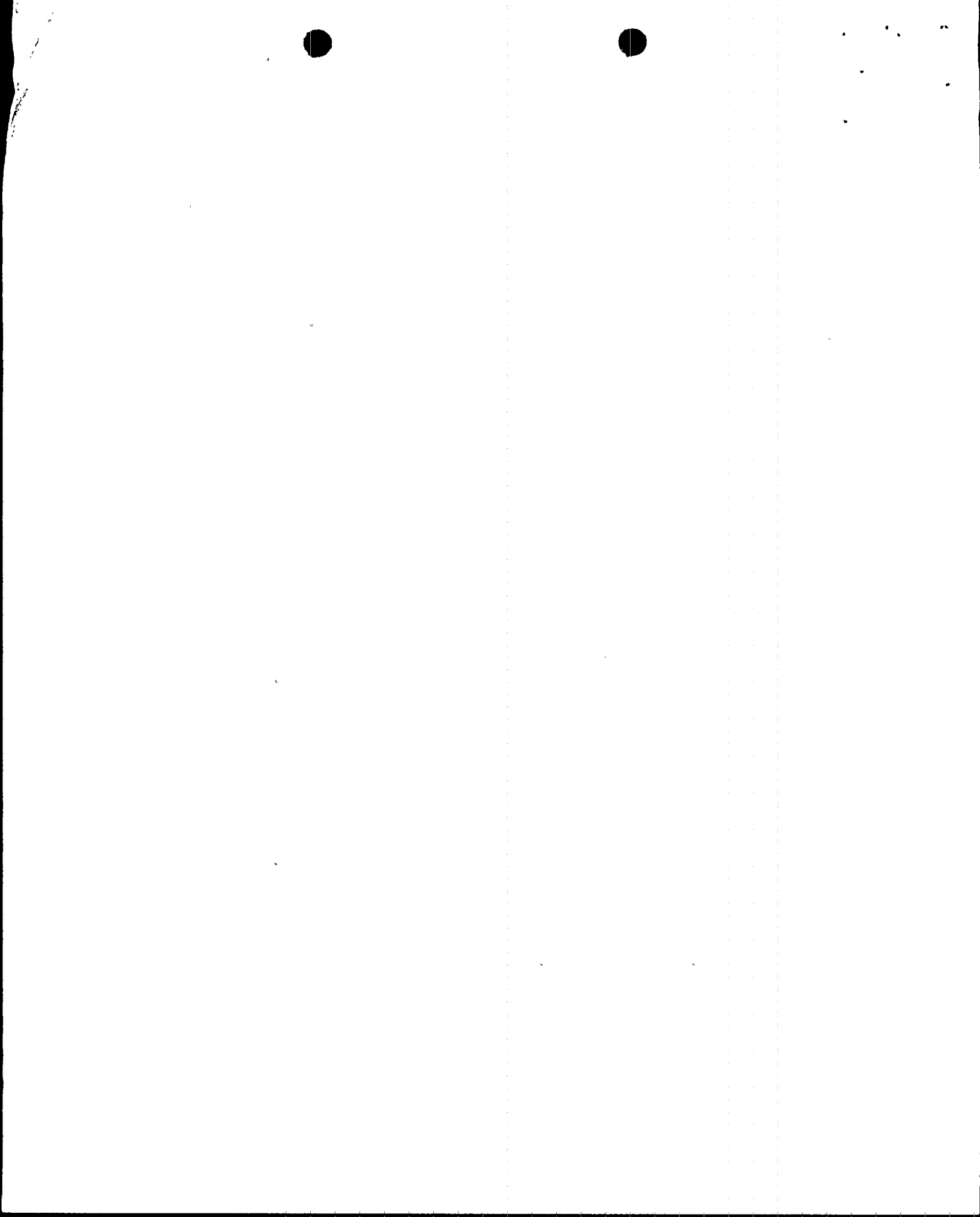
In addition to particulate and iodine monitoring, the current Technical Specifications specify sampling of precipitation. Based upon the significant data base associated with sampling precipitation at Turkey Point, FPL could find no reason to continue such surveillance.

FPL has concluded that the proposed airborne monitoring program meets the intent of NUREG 0472.

Waterborne

Circulating water and intake cooling water for the Turkey Point facility come from an on-site closed cooling canal system which completely surrounds the facility (FSAR 2.1). Liquid effluents are directed to the closed system.

The closed cooling canal is highly saline and is, therefore, unfit as a direct source for-irrigation or consumption. It is also not used for recreation. Under normal conditions the hydraulic gradient causes groundwater to move slowly towards the east (FSAR 2.10). The nearest wells containing water sufficiently fresh for irrigation purposes are about 3 1/2 miles from the



site. Near community drinking waters are obtained from well fields in the vicinity of Homestead, approximately 10 miles away.

The proposed sample locations for the Turkey Point waterborne samples are east (T42) and southeast (T81) of the closed cooling system, at locations beyond the site boundary in the direction of the normal hydraulic gradient. The control location (T67) is sufficiently beyond any influence from the plant. These locations are specified in the Turkey Point Plant ODCM.

The current Turkey Point 3 & 4 specifications require waterborne samples that are not consistent with the bases of NUREG 0472 in accordance with the following criteria:

1. Salt water not used for recreation.
2. Not tapped for drinking or irrigation.
3. Not subject to contamination from plant effluents.

In consideration of the above and the significant data base available from the existing sample program, FPL sees no reason to continue Technical Specification surveillance on samples which NUREG 0472 excludes. FPL believes, therefore, that the proposed waterborne samples meet the intent of NUREG 0472.

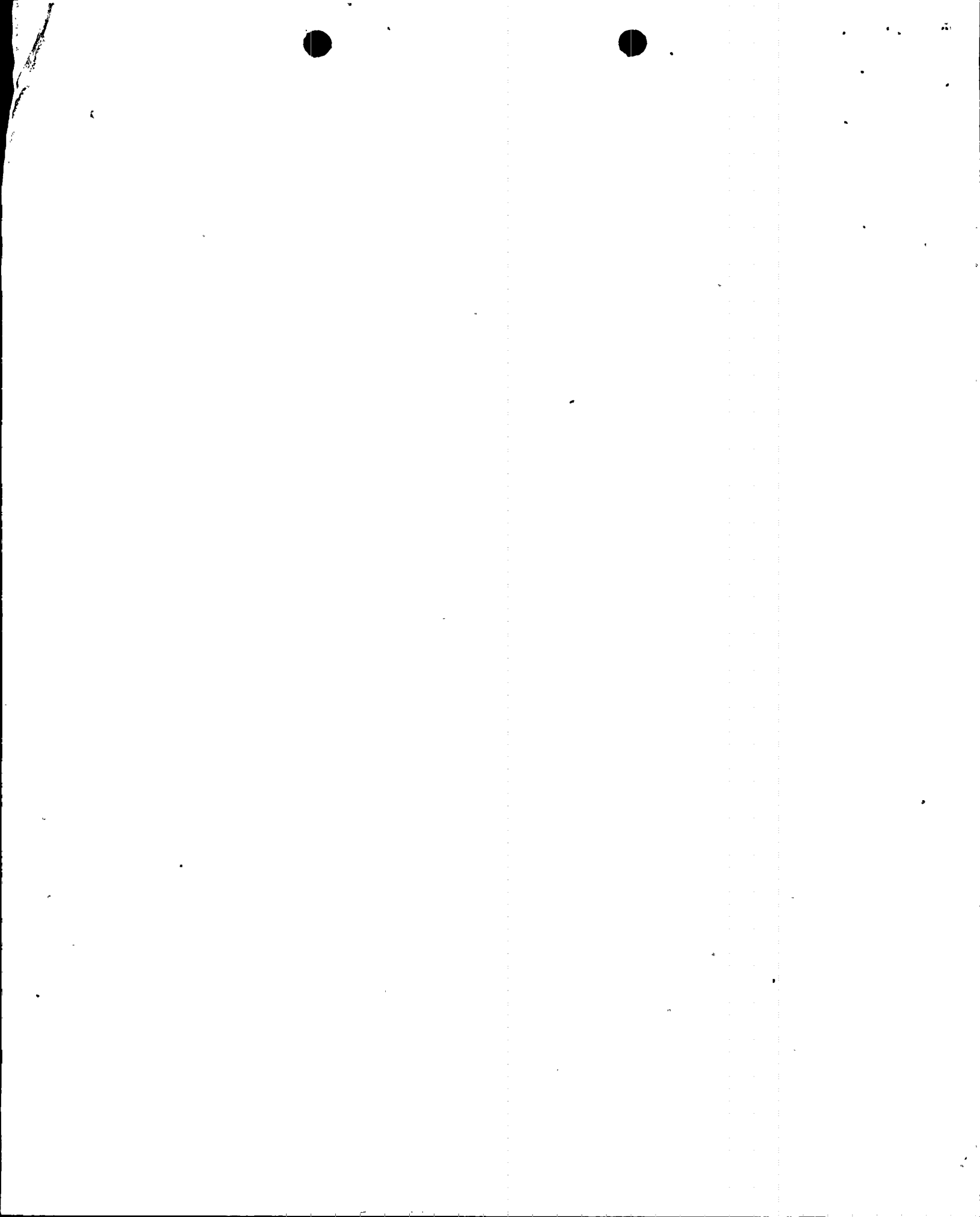
Ingestion

Fish and Invertebrates

As previously stated, all liquid effluents are directed into the closed cooling canal. Commercial and/or recreational fishing is prohibited in the closed cooling system. The proposed sample locations (T81 and T67) are consistent with the gradient considerations used to select the waterborne sample point. In consideration of the no direct release pathway and historical sampling experience, no specificity has been applied to the crustacea or fish sampling requirement. For crustacea this is consistent with the current sampling requirements which specify lobster, crab and/or shrimp. Generally the sample type which is predominant at the specified locations is the blue crab. For fish, the samples that will be collected are representative of the types which will be caught recreationally. Locations for fish and crustacea samples are specified in the Turkey Point Plant ODCM.

Broad-Leaf Vegetation

The proposed sample schedule implements sampling of broad-leaf vegetation grown nearest each of two different off-site locations of highest predicted annual average ground-level D/Q. NUREG 0472 specifies that 3 different kinds of broad-leaf vegetation be sampled. The topography of the Turkey Point Plant is unique, however, in that the site comprises mangrove swamps from along the shoreline, extending inland 3 or 4 miles. Open fields extend westward from the edge of the swamp (FSAR 2.4). There are not very many species of broad-leaf vegetation which thrive in the Turkey Point environment. At the locations chosen to



meet the criteria for D/Q (T40 and T41), it was judged that only one broad-leaf sample type would be consistently available. The sample type is the Brazilian Pepper leaf. No specificity was placed on the selected samples, however, in order not to preclude other types of vegetation (e.g., mangrove) if it is found selectively available. The control location (T67) was selected based upon availability of similar broad-leaf type. Sample locations are specified in the Turkey Point Plant UDCM.

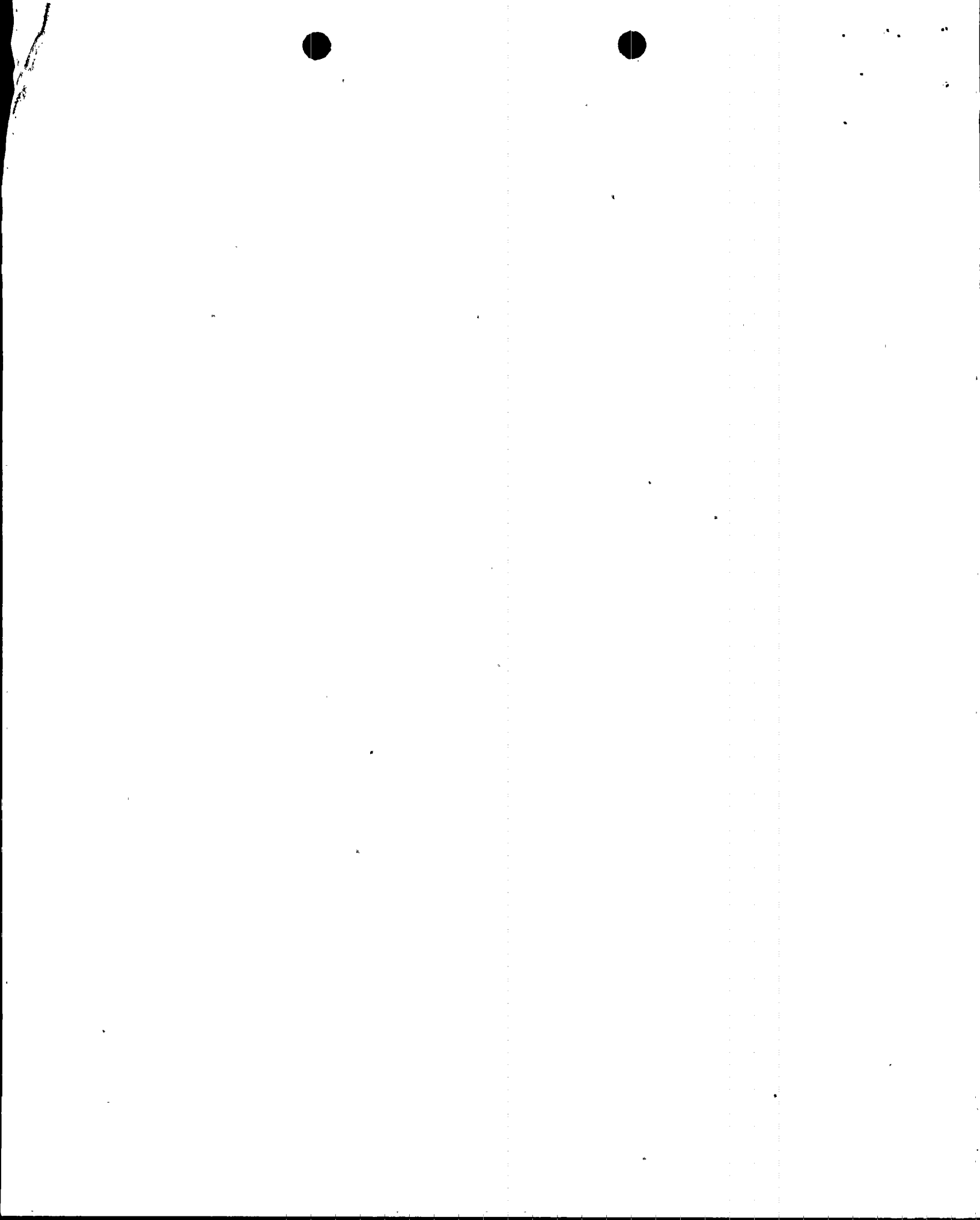
The proposed sample locations do not include samples for milk or food products (other than broad-leaf vegetation).

No milk sampling is required based upon the last milk animal survey which indicated there are no milk animals within 5 miles of the Turkey Point Plant. Should milk animals be found within 5 miles during a land use census, this sample would have to be added to the program pursuant to Specification 4.12.2.

No food product sampling is specified, since water used for irrigation purposes is not influenced by plant discharges.

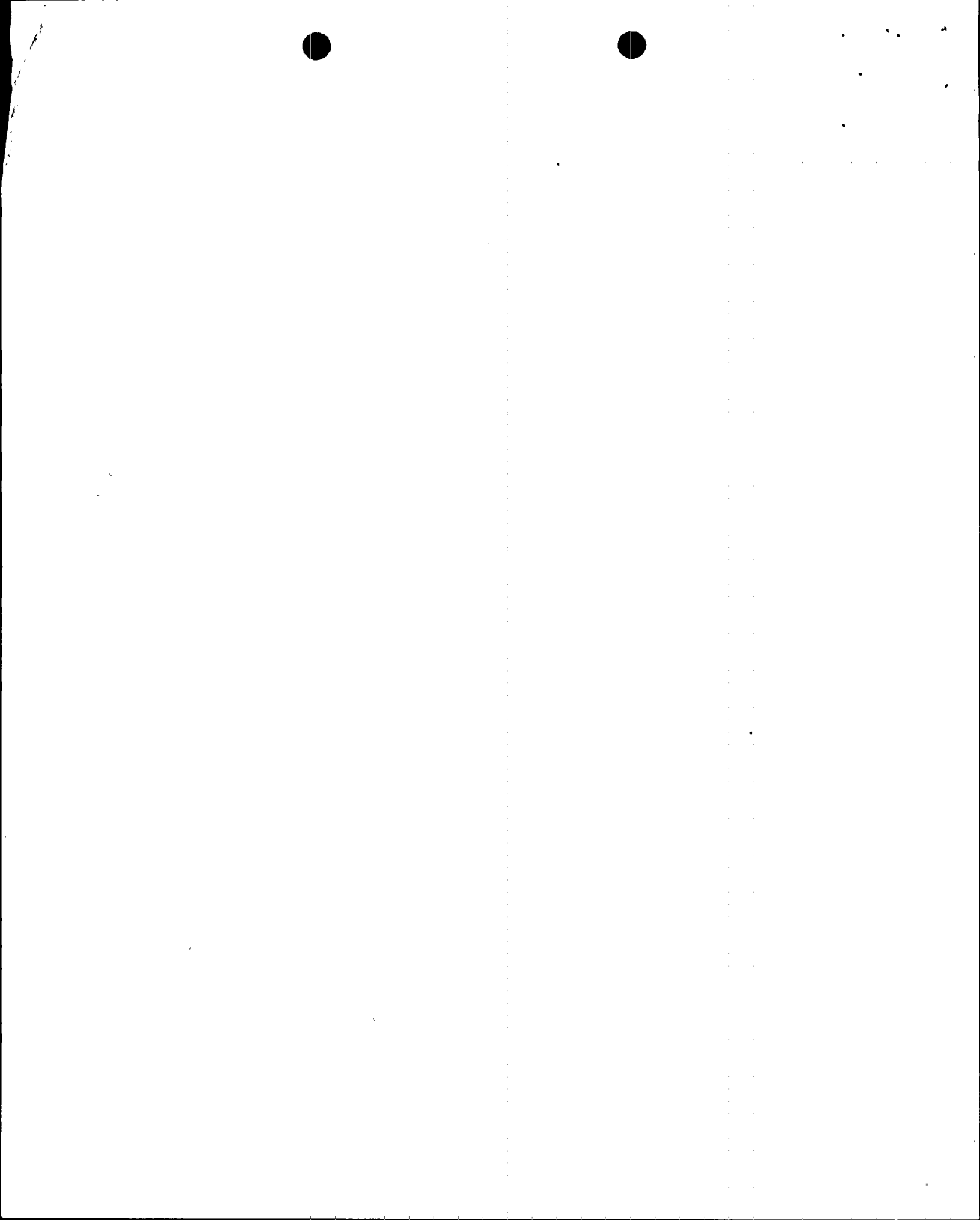
In consideration of the above, and the significant data base available from the existing sample program, FPL sees no reason to continue Technical Specification surveillance on samples not specified by NUREG 0472.

FPL has determined that the proposed ingestion monitoring samples meet the intent of NUREG 0472.



RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE
TURKEY POINT PLANT
Key to Sample Locations

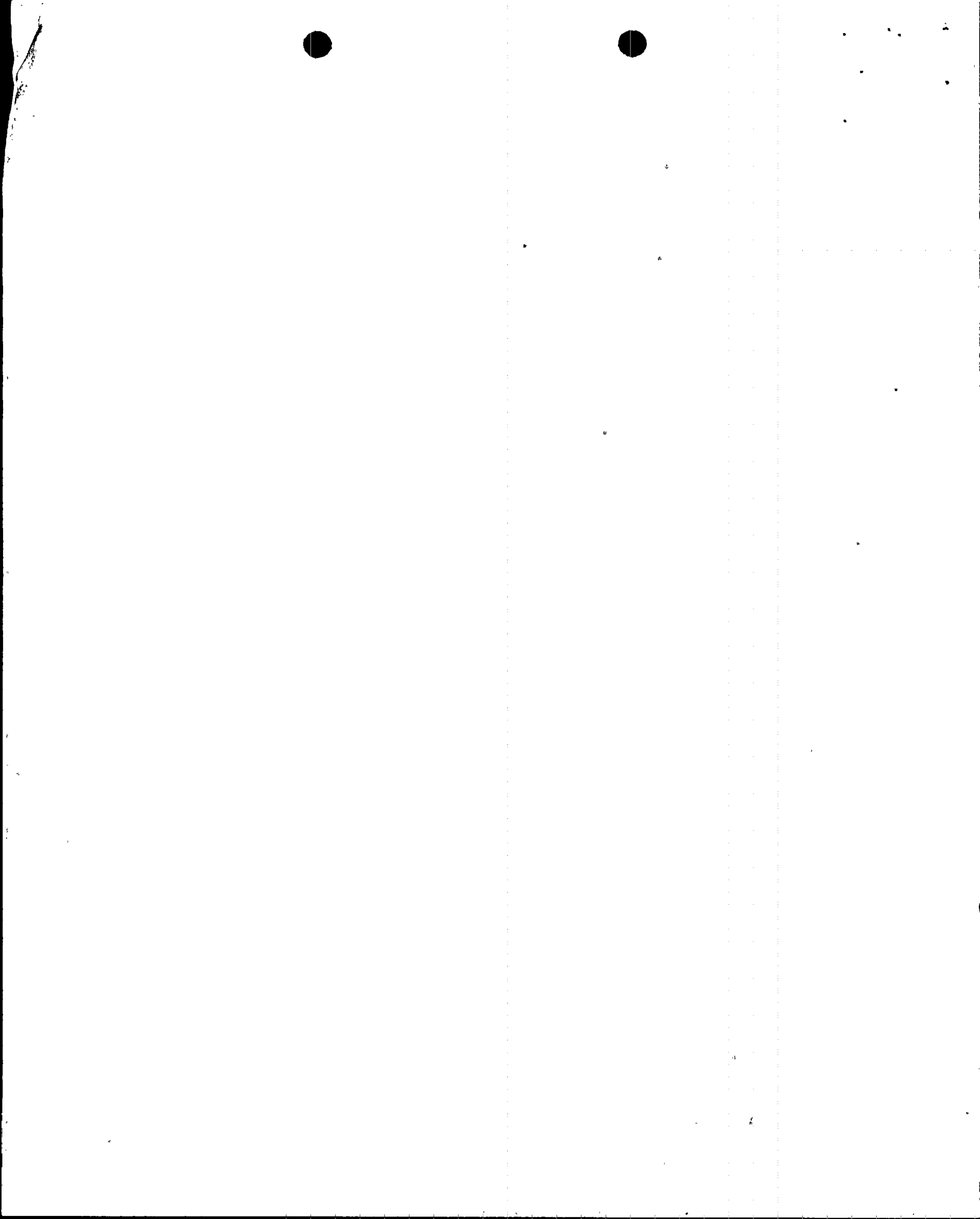
Pathway	Location	Description	Samples Collected	Sample Collection Frequency	Approximate Distance (miles)	Direction Sector
DIRECT RADIATION	N-1	Convoy Point	TLD	Quarterly	2	N
DIRECT RADIATION	N-5	North of Moody Dr.	TLD	Quarterly	6	N
DIRECT RADIATION	N-10	Old Cutler Rd. at S.W. 87th Ave.	TLD	Quarterly	12	N
DIRECT RADIATION	NNW-1	Turkey Point Entrance Road	TLD	Quarterly	<1	NNW
DIRECT RADIATION	NNW-10	Burr Rd. at Hainlin Mill Dr.	TLD	Quarterly	9	NNW
DIRECT RADIATION	NW/WWN-1	Turkey Point Entrance Road	TLD	Quarterly	1	WWN
DIRECT RADIATION	NW-5	Dolan's Farm on King's Highway	TLD	Quarterly	4	NNW
DIRECT RADIATION	NW-10	Intersection of Farm Life Rd. and Coconut Palm Dr.	TLD	Quarterly	10	NW



ODCM

RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE
TURKEY POINT PLANT
Key to Sample Locations

Pathway	Location	Description	Samples Collected	Sample Collection Frequency	Approximate Distance (miles)	Direction Sector
DIRECT RADIATION	W/WNW-5	Palm Drive at Tallahassee Rd.	TLD	Quarterly	5	W
DIRECT RADIATION	WNW-10	Homestead near vehicle inspection station	TLD	Quarterly	9	WNW
DIRECT RADIATION	W-1	On site near cooling tower	TLD	Quarterly	1	W
DIRECT RADIATION	W-10	Florida City near fire tower	TLD	Quarterly	10	W
DIRECT RADIATION	WSW-10	Old Hawk missile site south of Florida City	TLD	Quarterly	12	WSW
DIRECT RADIATION	SW/SSW-1	On site near land utilizaion offices	TLD	Quarterly	1	SSW
DIRECT RADIATION	SW-10	U.S. 1 south of Florida City	TLD	Quarterly	10	SW
DIRECT RADIATION	SSW/SW-5	On site, southeast corner of cooling canals	TLD	Quarterly	5	SSW



ODCM

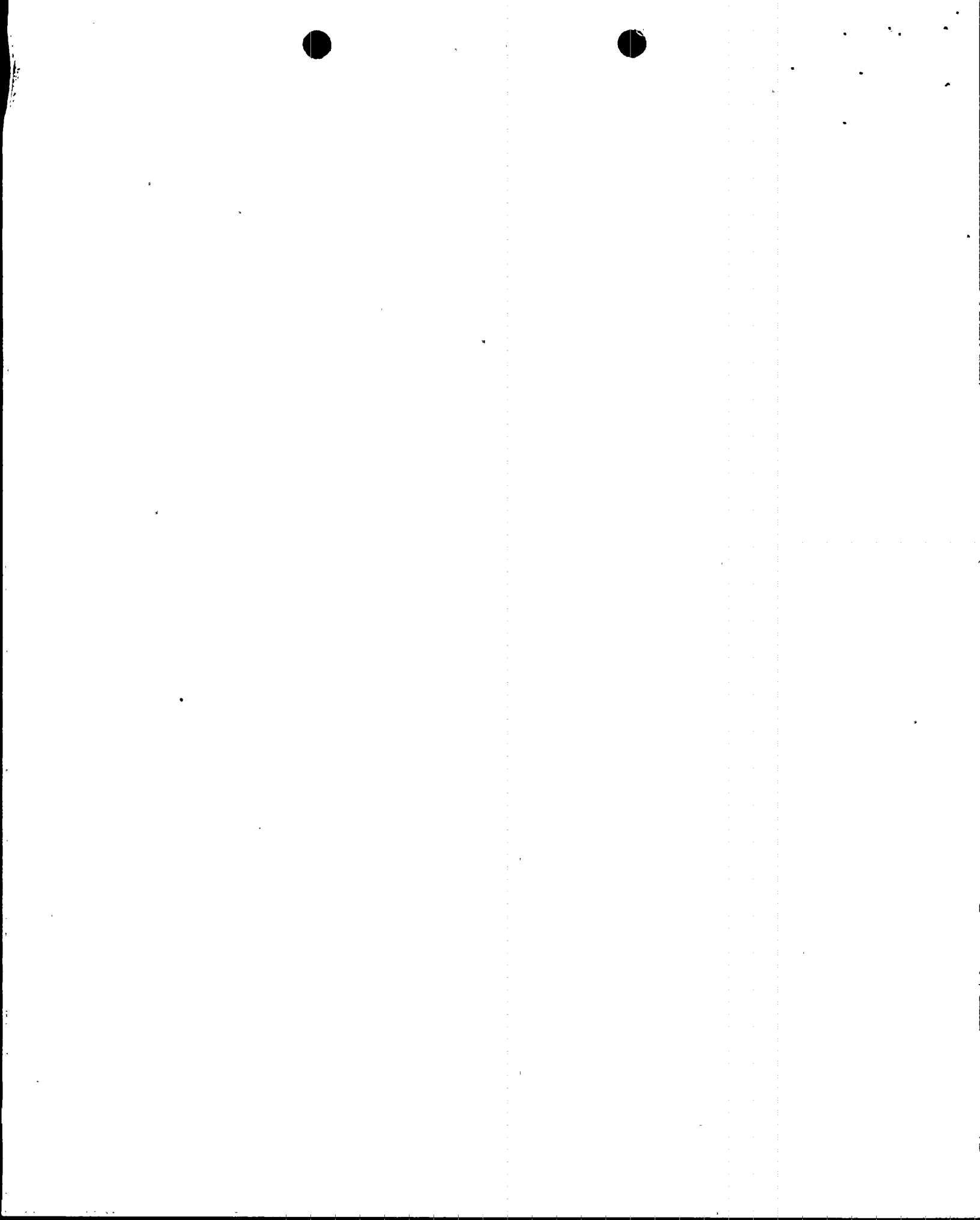
RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE
TURKEY POINT PLANT
Key to Sample Locations

Pathway	Location	Description	Samples Collected	Sample Collection Frequency	Approximate Distance (miles)	Direction Sector
DIRECT RADIATION	SSW-10	At Card Sound Bridge	TLD	Quarterly	10	SSW
DIRECT RADIATION	S-5	On site, south end of cooling canals	TLD	Quarterly	5	S
DIRECT RADIATION	S-10	Card Sound Rd. at Steamboat Creek	TLD	Quarterly	10	S
DIRECT RADIATION	SSE/S-1	Turtle Point	TLD	Quarterly	1	SSE
DIRECT RADIATION	SSE-10	Ocean Reef	TLD	Quarterly	8	SSE
AIRBORNE	T51	Homestead Bayfront Park	Radioiodine and particulates	Weekly	2	NNW
AIRBORNE	T57	Tree Nursery 316th Street	Radioiodine and particulates	Weekly	4	NW
AIRBORNE	T58	Turkey Point Entrance Rd.	Radioiodine and particulates	Weekly	1	NW

RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE
TURKEY POINT PLANT
Key to Sample Locations

Pathway	Location	Description	Samples Collected	Sample Collection Frequency	Approximate Distance (miles)	Direction Sector
AIRBORNE	T64*	Natoma Substation	Radioiodine and particulates	Weekly	22	NNE
AIRBORNE	T72	Turkey Point Boy Scout Camp	Radioiodine and particulates	Weekly	<1	WSW
WATERBORNE	T42	Biscayne Bay, at Turkey Point	Surface water	Monthly	<1	ENE
			Sediment from shoreline	Semi- annually		
WATERBORNE	T67*	Biscayne Bay, vicinity of Cutler Plant, north to Matheson Hammock Park	Surface water	Monthly	13-18	N, NNE
			Sediment from shoreline	Semi- annually		
WATERBORNE	T81	Card Sound, near mouth of old discharge canal	Surface water	Monthly	6	S
			Sediment from shoreline	Semi- annually		

* Denotes control sample.

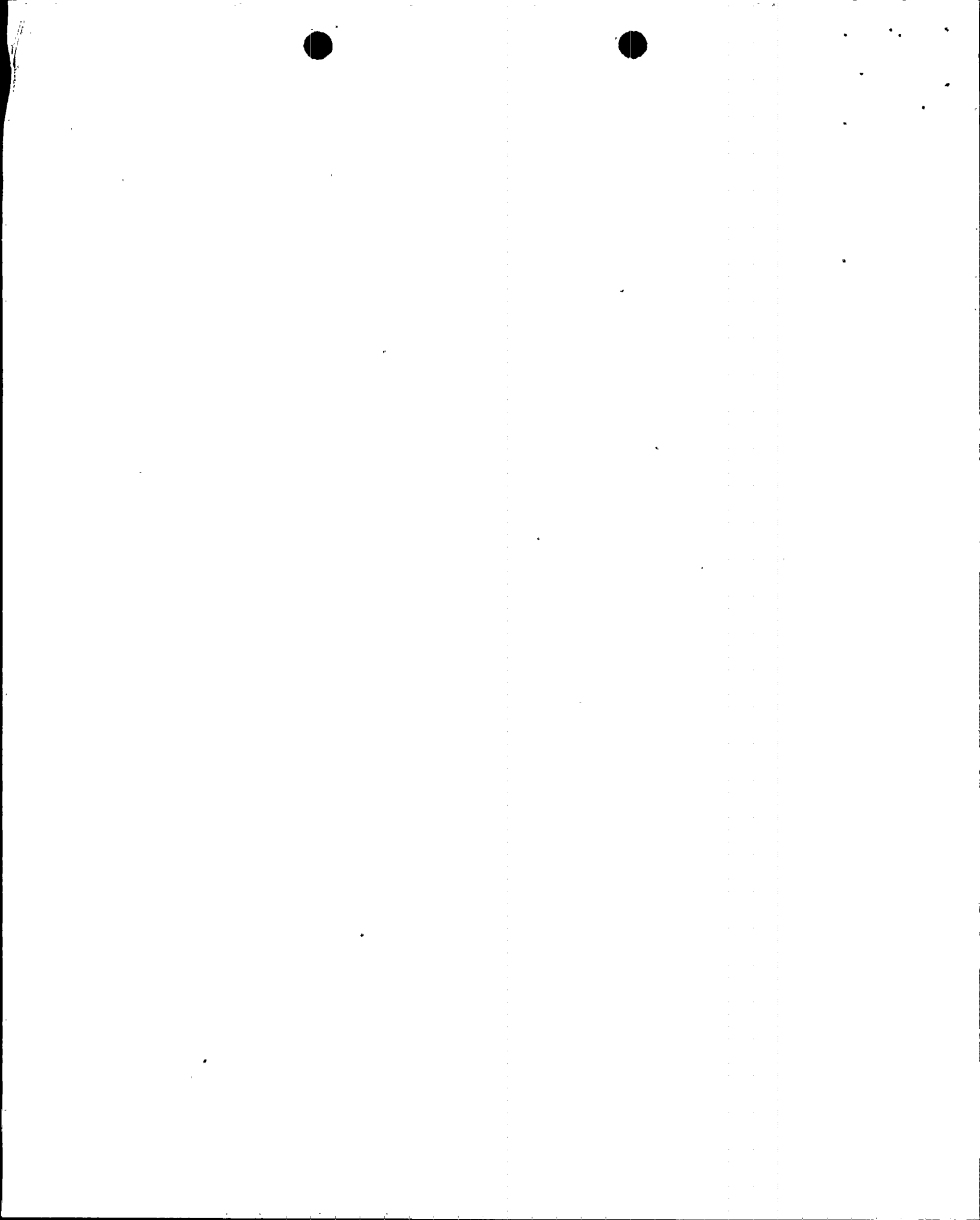


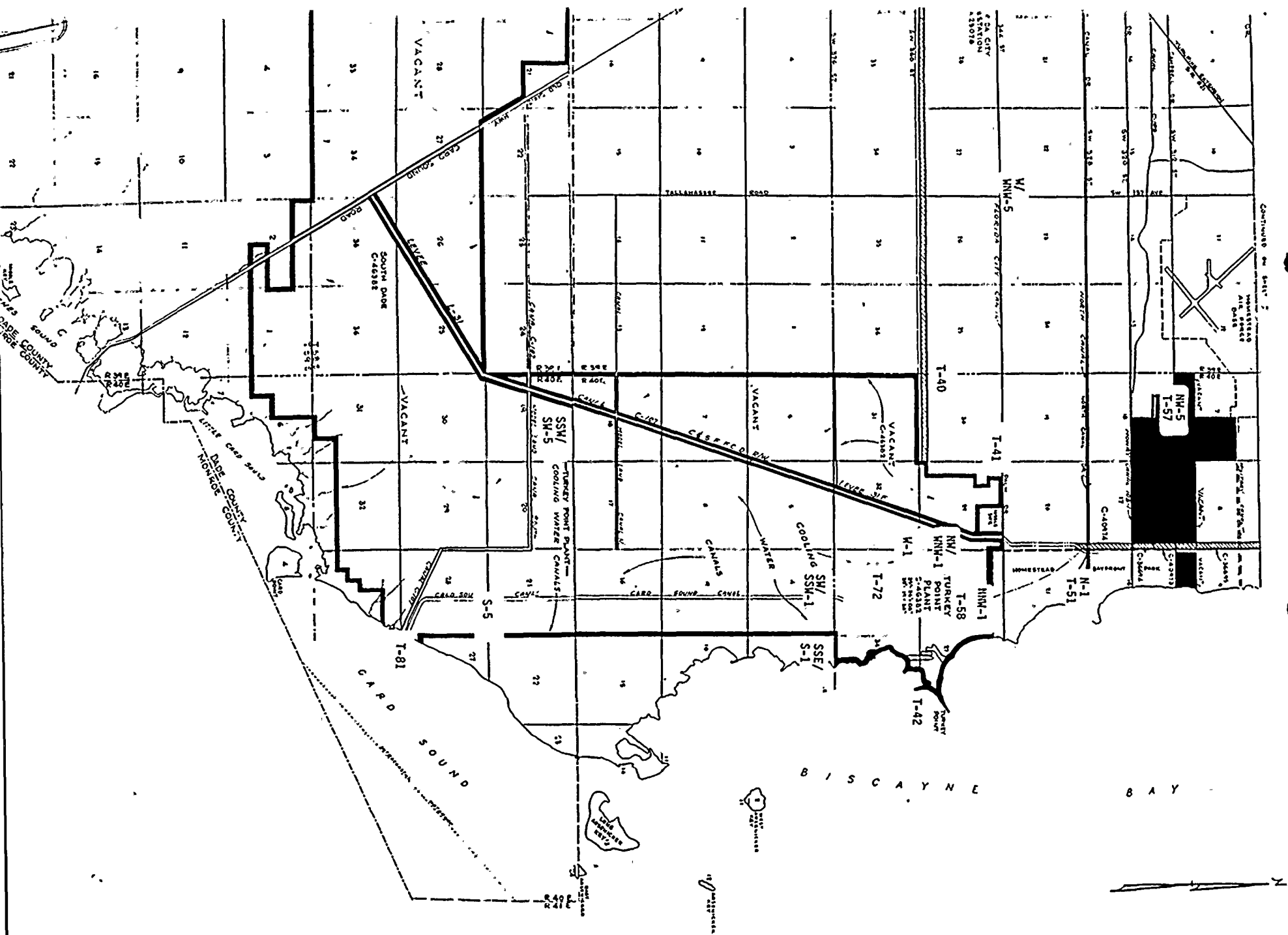
ODCM

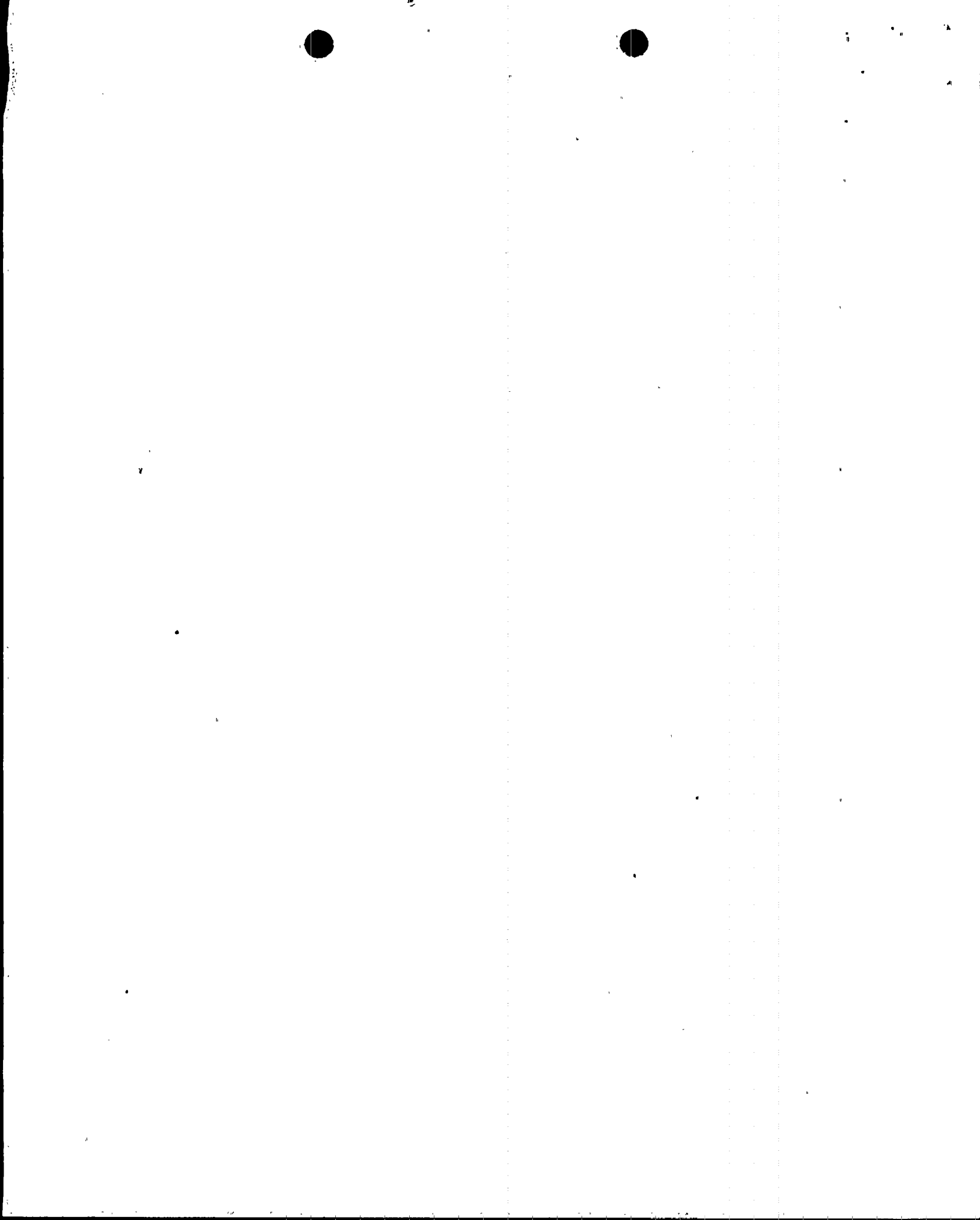
RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE
TURKEY POINT PLANT
Key to Sample Locations

Pathway	Location	Description	Samples Collected	Sample Collection Frequency	Approximate Distance (miles)	Direction Sector
FOOD PRODUCTS	T67*	Biscayne Bay, vicinity of Cutler Plant north to Matheson Hammock Park	Crustacea	Semi- annually	13-18	N, NNE
			Fish	Semi- annually		
FOOD PRODUCTS	T81	Card Sound, vicinity of Turkey Point Facility	Crustacea	Semi- annually	6	S
			Fish	Semi- annually		
FOOD PRODUCTS	T40	South of Palm Dr. on SW 117th St. extension	Broad leaf vegetation	Monthly	3	W
FOOD PRODUCTS	T41	Palm Dr. West of old missile site near the site boundary	Broad leaf vegetation	Monthly	2	WNW
FOOD PRODUCTS	T67	Near Biscayne Bay, vicinity of Cutler Plant north to Matheson Hammock Park	Broad leaf vegetation	Monthly	13-18	N, NNE

* Denotes Control Sample.







W-10

WSW-10

SW-10

SSW-10

S-10

EVERGLADES
WILDLIFE
MANAGEMENT
AREA
CONSERVATION
AREA

NW-10

NW-10

WNW-10

N-5

N-10

T-64

T-67

SSE-10

GENERAL LEGEND

- Interstate Highway
- U.S. Highway
- State Road
- County Road
- Local Road
- Unimproved Road
- Trail
- Canal
- Waterway
- Bay
- Lake
- Swamp
- Marsh
- Wetland
- Forest
- Open Land
- Urban Area
- Suburban Area
- Rural Area
- Water
- Coastline
- Island
- Peninsula
- Bayou
- Stream
- Creek
- River
- Channel
- Ditch
- Drainage
- Levee
- Dike
- Barrier
- Breakwater
- Pier
- Wharf
- Dock
- Harbor
- Port
- Shipyard
- Marina
- Boat Ramp
- Beach
- Dune
- Blowout
- Spit
- Point
- Headland
- Peninsula
- Island
- Atoll
- Reef
- Coral
- Shoal
- Bank
- Bar
- Sandbar
- Gravel Bar
- Shell Bar
- Clay Bar
- Silt Bar
- Organic Bar
- Artificial Bar
- Natural Bar
- Barrier
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- Bank
- Bar
- Sandbar
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- Shell Bar
- Clay Bar
- Silt Bar
- Organic Bar
- Artificial Bar
- Natural Bar

GENERAL HIGHWAY MAP
DADE COUNTY
FLORIDA

ISSUED BY THE
STATE TOPOGRAPHIC OFFICE
DIVISION OF PLANNING AND PROGRAMS
STATE OF FLORIDA
DEPARTMENT OF TRANSPORTATION
PLANNING AND PROGRAMS
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
Scale: 1 inch = 10 miles
1:62,500

