

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

In the Matter of:

FLORIDA POWER & LIGHT COMPANY
(St. Lucie Plant, Unit No. 2)

Docket No. 50-389A

ADDENDUM TO PETITION TO INTERVENE

I. On July 20, 1981, Metropolitan Dade County, Florida ("Dade County") filed a petition to intervene in this proceeding. As indicated in that petition, Dade County seeks to be granted intervenor status only if the Board grants intervention to Resources Recovery (Dade County); Inc. ("RRD").

II. This Addendum is filed by Metropolitan Dade County, Florida.

III. All correspondence and communications regarding this Addendum should be addressed to:

Robert R. Nordhaus
Van Ness, Feldman, Sutcliffe, Curtis & Levenberg
1050 Thomas Jefferson Street, NW
Seventh Floor
Washington, D.C. 20007

Reubin O'D. Askew
Greenberg, Traurig, Askew, Hoffman
Lipoff, Quentel & Wolff, P.A.
1401 Brickell Avenue
Miami, Florida 33131

IV. Should the Board find that the requested intervention on a conditional basis as described above is not appropriate, Dade County requests that its petition be considered in the alternative to be a request under Section 2.715(c) of the Commission's rules. That section affords to representatives of "an interested State, county, municipality, and/or agencies thereof," an opportunity to participate in the proceeding and

to advise the Commission "without requiring the representative to take a position with respect to the issue."

V. As described in its previously-filed Petition to Intervene, Dade County has entered into contracts with both RRD and with Florida Power & Light Company ("FPL") regarding a solid waste resource recovery project located in Dade County. The viability of the project may be affected by the licensing of St. Lucie Unit No. 2, which may enhance FP & L's position in the electric power market in South Florida, and by FPL's associated control over transmission facilities needed to transmit power generated by the facility to utility buyers.

VI. These facts form the basis for Dade County's interest in this proceeding. Dade County accordingly requests that the Commission grant its previously-filed Petition to Intervene, or, in the alternative, provide an opportunity to participate in the proceeding pursuant to Section 2.715(c) of the Commission's rules.

Respectfully submitted,

VAN NESS, FELDMAN, SUTCLIFFE,
CURTIS & LEVENBERG, P.C.
Associate Special Counsel to
Metropolitan Dade County, Florida

By: 

ROBERT R. NORDHAUS

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:)

FLORIDA POWER & LIGHT COMPANY)
(St. Lucie Plant, Unit No. 2))
_____)

Docket No. 50-389A

CERTIFICATE OF SERVICE

I hereby certify that copies of the Petition to Intervene submitted by Dade County were served on the following persons via first class mail, postage prepaid, this 29th day of July, 1981:

Ivan W. Smith, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Michael A. Duggan, Esq.
College of Business Administration
University of Texas
Austin, Texas 78712

Robert M. Lazo, Esq.
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Donald A. Kaplan, Esq.
Robert Fabrikant, Esq.
Antitrust Division
U.S. Department of Justice
Washington, D.C. 20530

Jerome E. Sharfman, Esq., Chairman
Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Joseph Rutberg, Esq.
Antitrust Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Jerome D. Saltzman, Chief
Antitrust and Indemnity Group
Office of the Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Richard E. Salzman, Esq.
Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Daniel M. Gribbons, Esq.
Herbert Dym, Esq.
Covington and Burling
888 - 15th Street, NW
Washington, D.C. 20006

J. A. Bouknight, Jr., Esq.
Lowenstein, Newman, Reis & Axelrad
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

John E. Mathews, Jr., Esq.
Mathews, Osborne, Ehrlich, McNatt, Gobelman & Cobb
1500 American Heritage Life Building
Jacksonville, Florida 32202

Robert A. Jablon, Esq.
Speigel and McDiarmid
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

William C. Wise, Esq.
1200 - 18th Street, N.W.
Suite 500
Washington, D.C. 10036

Janet Urban, Esq.
P. O. Box 14141
Washington, D.C. 20044

William H. Chandler, Esq.
Chandler O'Neal, Avera, Gray, Lang & Stripling
P. O. Drawer O
Gainesville, Florida 32602

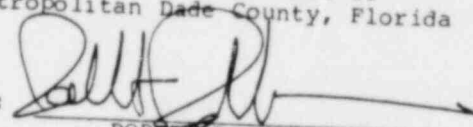
Michael C. Farrar, Esq.
Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Florida Power & Light Company
Attn: Dr. Robert E. Uhrig
Vice President
Advanced Systems & Technology
P. O. Box 529100
Miami, Florida 33152

Respectfully submitted,

ROBERT R. NORDHAUS
VAN NESS, FELDMAN, SUTCLIFFE,
CURTIS, & LEVENBERG, P.C.
Associate Special Counsel to
Metropolitan Dade County, Florida

By:



ROBERT R. NORDHAUS