

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)	Docket Nos. 50-250-OLA-3
)	50-251-OLA-3
FLORIDA POWER AND LIGHT COMPANY)	
)	
(Turkey Point Nuclear Generating)	(Increased Fuel Enrichment)
Units 3 & 4))	

LICENSEE INTERROGATORIES
TO CENTER
FOR NUCLEAR RESPONSIBILITY AND
JOETTE LORION

Florida Power & Light Company (Licensee) hereby serves its First Set of Interrogatories to the Center for Nuclear Responsibility and Joette Lorion (Intervenors) pursuant to 10 C.F.R. § 2.740b. Each interrogatory is to be answered fully, in writing, and under oath or affirmation within 14 days after service. Each answer should clearly indicate the interrogatory to which it is intended to be responsive.

If Intervenors, after exercising due diligence, cannot answer any portion of any of the interrogatories in full, they shall so state, shall answer the interrogatories to the extent possible, shall explain in detail why they are unable to answer the remainder of the interrogatories, and shall state when they expect to be able to answer any unanswered portions.

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1. Do Intervenors intend to call any person or persons as witnesses, including expert witnesses, in this proceeding in support of Contention 3? If yes, identify any such person or persons.
2. Provide summaries of the views, positions, or proposed testimony on Contention 3 of all persons identified in response to Interrogatory No. 1.
3. Identify all documents, books, reports and papers that Intervenors intend to employ or rely upon in presenting their direct case on Contention 3.
4. Identify all documents, books, reports and papers that Intervenors intend to employ or rely upon in conducting cross-examination of witnesses testifying in connection with Contention 3.
5. Are Intervenors contending that analyses related to Contention 3 contained in documents prepared by the Licensee or the NRC Staff (including documents such as Regulatory Guides and the Standard Review Plan) are deficient in whole or part? If yes, identify the documents and any particular portions thereof which Intervenors regard as deficient and explain in what way they are deficient.

6. Identify by author, title, date of publication, publisher and other pertinent information, all books, reports, papers or other documents which Intervenors relied upon in creating Contention 3.
7. Identify any person or persons, including expert witnesses, whether or not Intervenors intend to call them as witnesses in this proceeding, with whom Intervenors have communicated concerning Contention 3.
8. Provide summaries of the views, positions or opinions related to Contention 3 of all persons named in response to Interrogatory No. 7.
9. In Basis (a) for Contention 3, Intervenors state that "the safety margins for the enrichment of the fuel have been pushed to the limit and leave no margin of safety."
 - a) Please identify the "limit" to which Intervenors are referring, including identification of any regulation, regulatory guides, or other document prepared by the NRC which Intervenors contend establishes the basis for the "limit."
 - b) Please define the terms "safety margin" and "margin of safety" as used in Basis (a) to Contention 3.

- c) Are Intervenors contending that a limit on K_{eff} of 0.95 for storage of spent fuel leaves no margin of safety against a criticality accident? If yes, please specify the grounds for this contention.

10. What are the grounds for Intervenors contention that a K_{eff} limit of 0.95 for storage of spent or fresh fuel under abnormal conditions of full flooding with unborated water and a K_{eff} limit of 0.98 for storage of fresh fuel under abnormal, optimum moderation conditions is not sufficient to prevent criticality in accordance with Criterion 62 of Appendix A to 10 C.F.R. Part 50?

Respectfully submitted,


Harold F. Reis

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October 28, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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FLORIDA POWER & LIGHT COMPANY)	Docket Nos. 50-250 OLA-3
)	50-251 OLA-3
(Turkey Point Plant,)	
Units 3 and 4)	(Increased Fuel Enrichment)
)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee Interrogatories to Center for Nuclear Responsibility and Joette Lorion" in the above captioned proceeding, together with a Notice of Appearance of Counsel, were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below.

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

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

Dr. Richard F. Cole
Atomic Safety and Licensing Board Panel
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Atomic Safety and Licensing Board Panel
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Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

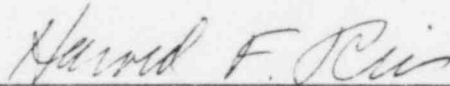
Office of Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Chief, Docketing and Service Section
(Original plus two copies)

Joette Lorion
7269 SW 54 Avenue
Miami, Florida 33143

Mitzi A. Young
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
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Dated: October 28, 1985