

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of nuclear outage
at Florida Power Corporation's
Crystal River Unit 3

DOCKET NO. 970261-EI
DATE: JUNE 9, 1997

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-97-0246-PCO-EI, issued February 28, 1997, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff is not sponsoring a witness in this proceeding.

b. All Known Exhibits

No exhibits at this time.

c. Staff's Statement of Basic Position

Staff's positions, if any, are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final recommendations will be based upon all the evidence in the record and may differ from the preliminary positions, if any, stated herein.

d. Staff's Position on the Issues

ISSUE 1: Was Florida Power Corporation's decision to shut-down Crystal River Unit No. 3 on September 2, 1996 prudent?

ACK _____

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

AFA _____

ISSUE 2: Did Florida Power Corporation's efforts to reduce costs, including downsizing and reduced reliance on contracted Crystal River Unit No. 3 engineering support, inappropriately reduce its attention to safety?

CAF _____

CMU _____

CTR _____

EAG _____

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ISSUE 3: Was Florida Power Corporation prudent in its approach of using engineering interim solutions through modifications to the Emergency Diesel Generator loading instead of implementing more permanent solutions?

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

ISSUE 4: Did Florida Power Corporation respond prudently to information affecting the operation of Crystal River Unit No. 3 including, but not limited to, employee concerns, modifications made at other Babcock & Wilcox plants, Nuclear Regulatory Commission requirements and the results of the company's own problem corrections?

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

ISSUE 5: Should the modifications being performed during the current extended outage have been accomplished during previous planned outages?

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

ISSUE 6: Did Florida Power Corporation display a pattern of management decisions at Crystal River Unit No. 3 that resulted in the current extended outage?

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

ISSUE 7: Based on the resolution of the previous issues, what amount of estimated replacement fuel costs, if any, should be disallowed for recovery by Florida Power Corporation?

POSITION: No position at this time pending further discovery and the evidence adduced at the hearing.

ORDER NO.
DOCKET NO. 970261-EI
PAGE 3

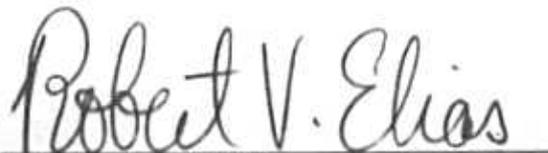
e. Pending Motions

Staff has no pending motions at this time.

f. Compliance with Order No. PSC-97-0246-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 9th day of June, 1997.



ROBERT V. ELIAS
Staff Counsel

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Gerald L. Gunter Building - Room 370
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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at Florida Power Corporation's
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FILED: JUNE 9, 1997

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Staff's Prehearing Statement has been furnished via U.S. Mail this 9th day of June, 1997, to the following:

Florida Industrial Power Users
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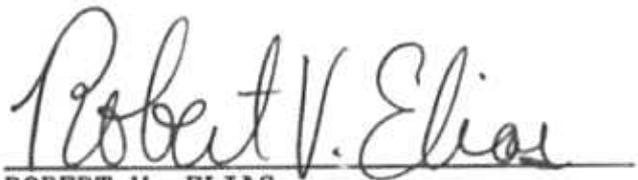
Office of the Attorney General
Michael Gross, esquire
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Certificate of Service
Docket No. 970261-EI

Louis Putney, Esquire
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A handwritten signature in cursive script that reads "Robert V. Elias". The signature is written in black ink and is positioned above a horizontal line.

ROBERT V. ELIAS
Chief, Bureau of Electric and Gas

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