



The State of Wisconsin  
Department of Justice  
Madison

53702

Patrick W. Walsh  
Assistant Attorney General  
(608) 266-7344

May 25, 1978

5/31/78

Secretary of the Commission  
United States Nuclear Regulatory  
Commission  
Washington, D.C. 20555

ATTN: Docketing and Service Section

Dear Sir:

Re: Petition for Leave to Participate as Interested  
State in Proceeding to Amend License No. DPR-43

Enclosed for filing please find the State of Wisconsin's  
Petition for Leave to Participate as Interested State in  
Proceeding to Amend License No. DPR-43 (Docket No. 50-305).  
On this date, copies of this petition have been mailed to the  
Executive Legal Director, United States Nuclear Regulatory  
Commission and to Steven E. Keane, counsel for the licensee.

Sincerely,

*Patrick Walsh*

Patrick Walsh  
Assistant Attorney General

PW:bl

cc: Executive Legal Director, U.S.N.R.C.  
Steven E. Keane

Reg. Files

50-305



Bronson C. La Follette  
Attorney General

David J. Hanson  
Deputy Attorney General

Re: DPR-43, sub. 5/31.....

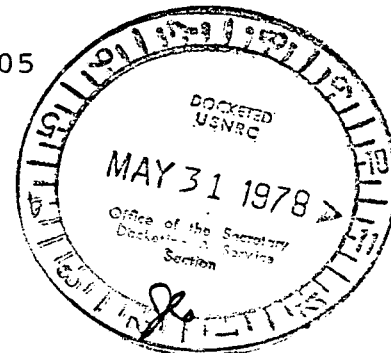
UNITED STATES NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

Wisconsin Public Service )  
Corporation, Wisconsin Power )  
& Light Company, Madison Gas )  
& Electric Company )

Docket No. 50-305

Kewaunee Nuclear Power Plant )  
Amendment to License No. DPR-43 )  
(Application to modify spent )  
fuel pool and to increase spent )  
fuel storage capacity) )



PETITION FOR LEAVE TO PARTICIPATE  
AS INTERESTED STATE

The State of Wisconsin Department of Justice, at the request of Governor Martin J. Schreiber, and on behalf of the State of Wisconsin, requests leave to participate as an interested state in the above-entitled proceeding, pursuant to 10 CFR 2.715 (c). The State further requests that the Commission grant a hearing on the applicant's request to amend License No. DPR-43 in order to assure a complete and thorough exploration of all issues.

The State of Wisconsin has a substantial interest in the utilities' request to increase the volume of spent nuclear fuel stored at the Kewaunee nuclear power plant. The State has a responsibility to insure that the health, safety and environment of its citizens are protected and that all viable alternatives to the proposed expansion, as well as any long-term consequences of such expansion, are fully considered. The State is aware that the date for intervention in this proceeding has passed and is prepare to enter the proceeding as it currently exists, and will not upset any of the time schedules set forth for these

proceedings with motions or other pleadings which would be inconsistent therewith.

Dated this 25<sup>th</sup> day of May, 1978.

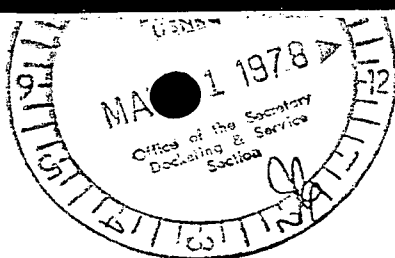
Respectfully submitted,

BRONSON C. LA FOLLETTE  
Attorney General

A handwritten signature in cursive script, appearing to read "Patrick Walsh".

PATRICK WALSH  
Assistant Attorney General

114 East, State Capitol  
Madison, Wisconsin 53702  
(608) 266-7344



1552 S. 11th St.  
Sheboygan, WI 53081

Secretary  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Services Branch

To Whom It May Concern:

I would like permission to make a "limited Appearance" in any hearings NRC holds on Point Beach, Docket 50-266 & Docket 50-301 and Kewaunee, Docket 50-305 concerning requests to compact and store additional spent nuclear fuel at these plants.

Living within a 50 mile radius I am greatly concerned about the effects these spent fuel rods will have upon the land and health of those living near the area and upon future generations. Fertile, productive land is a scarce commodity.

Sincerely,

*Joan Kaeiser*

Joan Kaeiser  
1552 S. 11th St.  
Sheboygan, WI 53081

Acknowledged by card. 5/31

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

WISCONSIN PUBLIC SERVICE CORPORA- )  
TION, ET AL )

(Kewaunee Nuclear Power Plant) )  
)  
)  
)

Docket No.(s) 50-305

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) <sup>st</sup> upon each person designated on the official service list compiled by the Office of the Secretary of the Commission in this proceeding in accordance with the requirements of Section 2.712 of 10 CFR Part 2 - Rules of Practice, of the Nuclear Regulatory Commission's Rules and Regulations.

Dated at Washington, D.C. this

31<sup>st</sup> day of May 1978.

Reginald T. Downing  
Office of the Secretary of the Commission

*1- Petition for leave to participate as  
Interested State in Proceeding to Amend  
license No. DPR-43  
2-limited appearance request - G. Kaiser*

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )

WISCONSIN PUBLIC SERVICE CORPORA- )  
TION )

(Kewaunee Nuclear Power Plant) )

Docket No.(s) 50-305

SERVICE LIST

Robert M. Lazo, Esq., Chairman  
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