

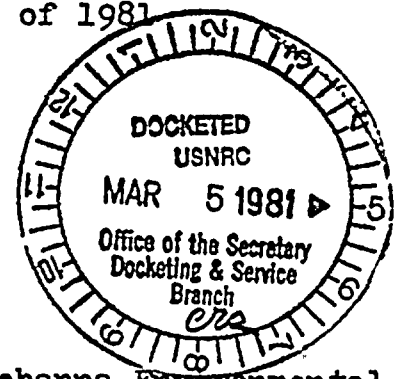
In the Matter of the Application :
for a License to bring nuclear :
fuel on-site and/or to store :
nuclear fuel in the spent fuel :
pools of the Susquehanna Steam :
Electric Station by Pennsylvania :
Power & Light Company. :

CLEAR REGULATORY
COMMISSION

APPLICATION NO. _____

of 1981

3/2/81



PETITION FOR LEAVE TO INTERVENE
AND
REQUEST FOR HEARING

Pursuant to 10CFR2.714, the Susquehanna Environmental Advocates, a private, non-profit incorporation hereinafter referred to as SEA, hereby petition for leave to intervene in the above-captioned matter and respectfully request an evidential public hearing on this matter and the issues detailed below:

I.

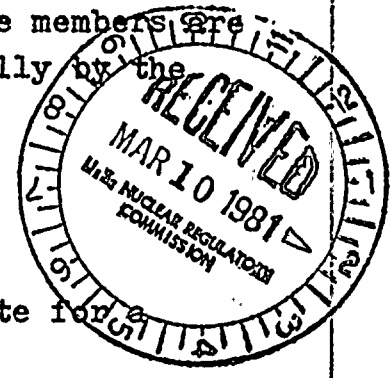
STANDING-INTEREST OF THE PETITIONER

SEA has about 150 members. Most of the members are customers of PP&L and would be affected financially by the action referred to in the caption.

II.

ISSUES TO BE RAISED

1. The cost of storing the fuel on-site for a full year before testing can begin.
2. The cost of security for the fuel for the year it will be on-site prior to testing.
3. The health and safety risks, if any, of bringing and storing the fuel on-site.
4. The comparative cost of uranium fuel now and the projected cost one year from now, when the fuel could be used by PP&L.



III.

CONCLUSION

The issuance of a license for PP&L to bring fuel on-site and/or to store fuel in the spent-fuel-pools may be harmful to the financial interests of PP&L ratepayers, and

Acknowledged by card. J. L. E. L. E. L.

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thus, the Petitioner. These issues should be fully explored by the NRC before a decision is made on the Application.

Respectfully submitted,

BY: Gerald R. Schultz
Gerald R. Schultz,
Coordinator, SEA

DATED: March 2, 1981