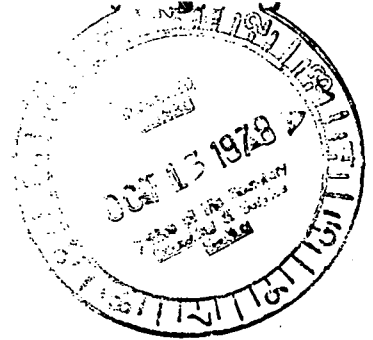


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

10/10/78



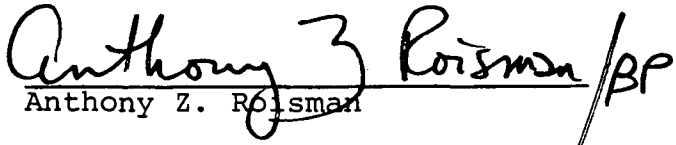
In the Matter of :  
: COMMONWEALTH EDISON CO., et al. : Docket Nos. 50-237  
: : ~~50-249~~  
(Amendments to Operating Licenses) : 50-254  
: 50-265

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance on behalf of Citizens for a Better Environment and Natural Resources Defense Council in the captioned matter. In accordance with § 2.713 of the Commission's Rules of Practice, the following information is provided:

Name: Anthony Z. Roisman  
Address: Natural Resources Defense Council  
917 15th Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 737-5000  
Admission: United States Court of Appeals,  
District of Columbia Circuit

Service in the captioned matter should be made upon the undersigned.

  
Anthony Z. Roisman /BP

October 10, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of :  
: Docket Nos. 50-237  
COMMONWEALTH EDISON CO., et al. : 50-249  
: 50-254  
(Amendments to Operating Licenses) : 50-265

NATURAL RESOURCES DEFENSE COUNCIL REQUEST  
FOR LEAVE TO FILE A RESPONSE

Applicants have filed an answer to NRDC and CBE's Petition for leave to intervene raising broad-ranging issues regarding the standing of the Petitioners and anticipatorily challenging the validity of hypothesized contentions of Petitioners. These issues are briefed with numerous citations which appear to raise important issues which warrant a careful response. See in contrast to applicant's standing argument NAACP v. Alabama, 357 U.S. 449 (1958), holding that a state may not constitutionally force a group to disclose the names of its members in order to operate within the state. We therefore request leave to file a response to applicant's answer.

We have yet to receive a response from the Staff. The Staff may also challenge Petitioners' rights of intervention. In order to avoid the necessity of having to respond separately to the Staff, we request that the time for filing a response to the answer of Staff and Applicant be 10 days from the date the Staff files its answer, 15 days if the filing is by mail.

For the reasons stated above, we urge the Board to grant the motion.

Respectfully submitted,

*Anthony Z. Roisman /BR*

Anthony Z. Roisman  
Natural Resources Defense Council  
917 15th Street, N.W.  
Washington, D.C. 20005  
(202)737-5000

October 10, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of :  
: COMMONWEALTH EDISON CO., et al. : Docket Nos. 50-237  
: (Amendments to Operating Licenses) : 50-249  
: 50-254  
: 50-265

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing NOTICE OF APPEARANCE and NRDC REQUEST FOR LEAVE TO FILE A RESPONSE were mailed today, October 10, 1978, first class postage prepaid, to the following:

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service

Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

John W. Rowe  
Isham, Lincoln & Beale  
One First National Plaza  
42nd Floor  
Chicago, Illinois 60603

Susan N. Sekuler  
Assistant Attorney General  
188 W. Randolph Street  
Suite 2315  
Chicago, Ill. 60601

Gary L. Milhollin, Esq.  
1815 Jefferson Street  
Madison, Wisconsin 53711

Mrs. Elizabeth B. Johnson  
Union Carbide Corporation  
Nuclear Division  
P.O. Box X  
Oak Ridge, Tennessee 37830

Dr. Quentin J. Stober  
Fisheries Research Institute  
University of Washington  
Seattle, Washington 98195

*Anthony Z. Roisman*  
Anthony Z. Roisman / RP