

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8101160226 DOC. DATE: 81/01/14 NOTARIZED: NO DOCKET #
 FACIL: 50-259 Browns Ferry Nuclear Power Station, Unit 1, Tennessee 05000259
 50-260 Browns Ferry Nuclear Power Station, Unit 2, Tennessee 05000260
 50-296 Browns Ferry Nuclear Power Station, Unit 3, Tennessee 05000296

AUTH. NAME AUTHOR AFFILIATION
 PAUL, T.W. Affiliation Unknown
 JOBE, R.W. Affiliation Unknown
 HALL, M.L. Affiliation Unknown
 RECIP. NAME RECIPIENT AFFILIATION
 Atomic Safety and Licensing Board Panel

SUBJECT: Petition for leave to intervene & request for hearing on TVA license amend requests.

DISTRIBUTION CODE: DS93S COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 4
 TITLE: Filings (Not Orig by NRC)

NOTES:

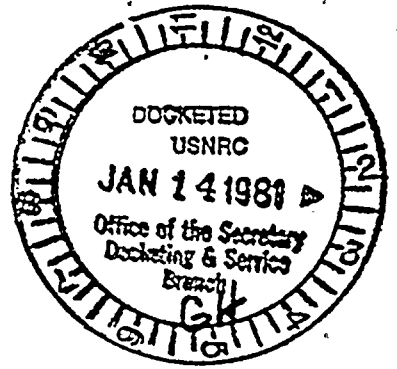
	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTTR	ENCL		LTTR	ENCL
ACTION:	NORRIS, S.	1		CLARK, R.J.	1	
	CLARK, R.	1				
INTERNAL:	ASLAP	5		ASLB	1	
	I&E	2		MRC PDR	1	
	OELD, BLANTON	1		PUBLIC AFFAIRS	1	
	<u>REG FILE</u>	1				
EXTERNAL:	LPDR	1		NSIC	1	

JAN 19 1981

TOTAL NUMBER OF COPIES REQUIRED: LTTR 17 ENCL 0

54

155
JAN 14 1981



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In The Matter Of:)	
TENNESSEE VALLEY AUTHORITY)	Docket Nos.
Browns Ferry Nuclear Plant)	50-259
Units Nos. 1, 2 and 3)	50-260
)	50-296

PETITION FOR LEAVE TO INTERVENE
AND
REQUEST FOR HEARING

TO: Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555
ATTENTION: Docketing and Services Branch

Pursuant to the provisions of §2.714 of 10 Code of Federal Regulations and the Commission's Notice of Consideration of Amendments to Facility Operating Licenses, dated December 4, 1980, the undersigned petitioner (or each of the undersigned petitioners, if more than one) petitions for leave to intervene in the above styled proceeding, and requests a hearing on the request of Tennessee Valley Authority (TVA) for amendments to its licenses, and respectfully states as follows:

1. Petitioner wishes to intervene in all aspects of TVA's request for amendments to Facility Operating License

DS03
s
1/0

8101150 226

G

Nos. DPR-33, DPR-52 and DPR-68, which proposed amendments would entail modification of the authority provided by paragraphs 2.B(5) and 2.D(3) of Licenses DPR-33, DPR-52 and DPR-68 and related license conditions and technical specifications, to authorize the licensee to store onsite the low level radioactive waste generated from operation of the Browns Ferry Plant for a period of five years.

2. Petitioner is an adult citizen of the United States of America and a resident and/or property owner in the geographic area in close proximity to the Browns Ferry Nuclear Plant, residing at the address shown below petitioner's signature to this petition.

3. The personal health and safety of petitioner, and of his or her descendants, whether now living or yet unborn, may be affected by this proceeding. Petitioner's home, occupation, recreational activities, quality of life, property, financial and other interests may be affected by this proceeding. Petitioner is a customer of either a rural electric system or of a municipally owned electric system which purchases and obtains its electricity from TVA. Petitioner is dependent upon drinking water and water for household purposes, the source of which may be affected by this proceeding; and is dependent upon milk, meat, fruits and vegetables grown and raised in close proximity to the Browns Ferry Nuclear Plant, and which may be affected by this proceeding.

Petitioner is dependent upon air for breathing, which may be affected by this proceeding. . Petitioner owns property which is subject to damage and/or loss in value as a result of this proceeding.

4. Any order which may be entered in this proceeding, if such order grants TVA's request for license amendments, may affect petitioner's interest by increasing the health and safety risks to petitioner by increasing the on-site radioactive inventory and increasing the risk of radioactive contamination to petitioner and his or her descendants, increasing the risk of fire, air contamination, water pollution and other dangers to petitioner and his or her descendants.

5. For the foregoing reasons, petitioner has a right to be a party to this proceeding and this petition should be granted.

6. A hearing should be held on the TVA's request for license amendments because this is a proceeding for amendment of a license to operate a nuclear facility and which involves a significant hazards consideration.

7. Service of any document required or permitted to be served on petitioner in this proceeding may be served on petitioner (or on the first named petitioner, if more than one), at

the address given below. said petitioner's signature.

Respectfully submitted,

(signature) Thomas W. Paul
(name) Thomas Wayne Paul
(address) 1120 Pratt Ave
Huntsville, Ala. 35801

(signature) Richard W. Jobe
(name) RICHARD W. JOBE
(address) 1134 Halsey Av.
Huntsville, AL. 35801

(signature) Marjorie L. Hall
(name) Marjorie L. Hall
(address) 1134 Halsey Ave
Huntsville, AL 35801

A copy of the foregoing petition has been sent by U.S.
mail to the following:

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

H.S. Sanger, Jr.
Tennessee Valley Authority
400 Commerce Ave., E 11B 33C
Knoxville, Tennessee 37401