

*yellow*

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
METROPOLITAN EDISON COMPANY, ET AL.  
(Three Mile Island Nuclear Station,  
Unit 2)

)  
)  
)  
)  
)

Docket No. 50-320

ANSWER OF AEC REGULATORY STAFF TO  
PETITION TO INTERVENE FILED BY BARBARA PRADEL

1. On May 28, 1974, the United States Atomic Energy Commission published a Notice of Opportunity for Hearing on Application for Facility Operating License and a Notice of Opportunity for Hearing with respect to whether the provisional construction permit should be continued, modified or terminated to protect environmental values in accordance with Appendix D to 10 CFR Part 50, concerning the Three Mile Island Nuclear Station, Unit 2 (39 F.R. 18497). The Notice provided for the submission of petitions to intervene in accordance with the provisions of 10 CFR § 2.714 of the Commission's Rules of Practice.
2. On June 24, 1974, Mrs. Barbara Pradel filed a timely petition to intervene in this proceeding.
3. The Regulatory Staff believes that the petition to intervene does not meet the requirements of 10 CFR § 2.714, and therefore, should be denied for the following reasons:

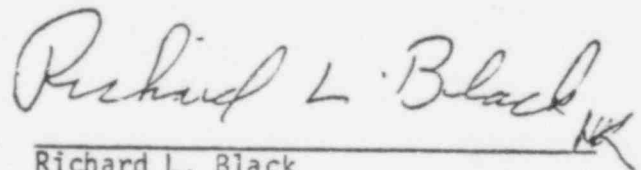
7905020001

G

16 165

- (a) Section 2.714 of 10 CFR requires a petitioner to show how the interest of the petitioner would be affected by the results of the proceeding. Mrs. Pradel has merely alleged in generalized terms the harmful effects of the facility upon herself and her family. The Staff believes that such generalized statements are insufficient to meet the requirements of 10 CFR § 2.714.
- (b) Section 2.714 of 10 CFR, as interpreted by the Atomic Safety and Licensing Appeal Board,<sup>1/</sup> requires that a petition to intervene to be acceptable must specify at least one relevant contention with reasonable specificity and with some basis assigned for it. Mrs. Pradel's petition is defective with respect to this requirement in that it fails to specify even one such relevant contention.

Respectfully submitted,



Richard L. Black  
Counsel for AEC Regulatory Staff

<sup>1/</sup> See, e.g., Northern States Power Company (Prairie Island Nuclear Generating Plant, Units 1 and 2), ALAB-107, RAI-73-3 188 (March 29, 1973); Mississippi Power and Light Company (Grand Gulf Nuclear Station, Units 1 and 2), ALAB-130, RAI-73-6 423 (June 19, 1973).

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
METROPOLITAN EDISON COMPANY, ET AL. ) Docket No. 50-320  
(Three Mile Island Nuclear Station, )  
Unit 2) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "ANSWER OF AEC REGULATORY STAFF TO PETITION TO INTERVENE FILED BY BARBARA PRADEL," dated July 8, 1974, in the above-captioned matter, have been served on the following by deposit in the United States mail, first class or air mail, this 8th day of July, 1974:

Mr. Sidney G. Kingsley, Chairman  
Atomic Safety and Licensing Board  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Atomic Safety and Licensing  
Board Panel  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Dr. Emmeth A. Luebke  
Atomic Safety and Licensing Board  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Atomic Safety and Licensing  
Appeal Board  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

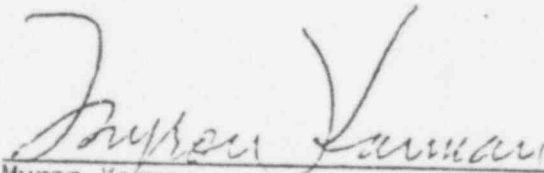
Dr. Frederick P. Cowan  
22 Browns Lane  
Bellport, New York 11713

Mr. Frank W. Karas  
Chief, Public Proceedings Staff  
Office of the Secretary of the  
Commission

Mr. Chauncey R. Kepford  
Citizens for a Safe Environment  
108 N. Pershing Avenue  
York, Pennsylvania 17403

U. S. Atomic Energy Commission  
Washington, D. C. 20545

George F. Trowbridge, Esq.  
Shaw, Pittman, Potts & Trowbridge  
Barr Building  
910 - 17th Street, N. W.  
Washington, D. C. 20006

16 167  
  
Myron Karman  
Counsel for AEC Regulatory Staff