

CAPITAL LEGAL FOUNDATION

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PR-50,51

November 26, 1979

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch



Dear Sir:

We hereby notify the Nuclear Regulatory Commission of the intent of the Scientists and Engineers for Secure Energy, Connecticut and New York Chapters, and of the Capital Legal Foundation to participate in the Commission's generic proceeding concerning storage and disposal of nuclear waste. This proceeding is more fully described in the Commission's notice of proposed rulemaking which appeared in 44 Federal Register 61372 (October 25, 1979).

Scientists and Engineers for Secure Energy is a nationwide organization of faculty members and researchers from American colleges and universities, both State and private. Its purpose is to correct the alarming degree of misunderstanding on fundamental scientific and technological issues permeating the current national energy debate. In pursuing this objective, Scientists and Engineers for Secure Energy is committed to offering its views, based on the considerable knowledge and expertise of its members, to the public and to the various governmental agencies with responsibility for the development of a proper legal framework for the resolution of these issues, including participation in judicial proceedings.

Sharing the concern of the national organization for a secure national energy base and for a national scheme for the safe storage and disposal of nuclear wastes, the New York Chapter of Scientists and Engineers for Secure Energy are aware of the problems associated with the West Valley New York disposal facility and with the future problems of storage for the Brookhaven National Laboratory. The Connecticut Chapter recognizes the importance of resolving all questions relating to the storage and disposal of nuclear waste for the State of Connecticut which has such a large portion of electricity produced by nuclear power.

Scientists and Engineers for Secure Energy filed a brief amicus curiae with the U. S. Supreme Court, and submitted a position paper to the Department of Transportation on proposed regulations on the transport of radioactive waste and, was a party to the

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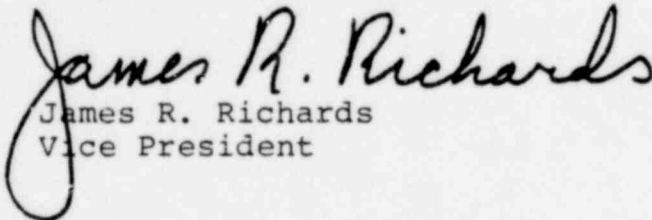
judicial review of the Nuclear Regulatory Commission's suspension of its proceedings on the generic environmental statement on mixed oxide fuel (GESMO).

The Capital Legal Foundation is a tax-exempt, not-for-profit organization which was formed for the purpose of engaging in non-partisan legal research and study and to provide legal representation for itself and others in matters of public interest at all levels of the judicial process. The Foundation has a deep interest in significant legal issues which are national in scope.

Capital Legal Foundation has participated in or initiated court actions involving the Nuclear Regulatory Commission's suspension of its GESMO proceeding; violations of the Clean Air Act by the U. S. Government Services Administration and by the Congress of the United States; OSHA's benzene and lead standards and, has participated in proceedings before OSHA involving OSHA's proposed carcinogen policy.

Scientists and Engineers for Secure Energy and Capital Legal Foundation intend to participate in the generic proceedings on nuclear waste disposal and storage to the fullest extent possible.

Respectfully submitted,

  
James R. Richards  
Vice President

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