

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



IN THE MATTER OF)

PUGET SOUND POWER & LIGHT COMPANY)
et al.)

(Skagit Nuclear Power Project)
Units 1 and 2)

DOCKET NOS. 50 - 522
50 - 523

PETITION TO INTERVENE

The GREENPEACE FOUNDATION of Vancouver, British Columbia, Canada, hereby petitions, pursuant to 10 C.F.R. s.s. 2.714 to intervene as a party in these proceedings.

1. Right to be made a party.

As the Petitioner represents a group of people whose interest will be affected by the project and whose interest will not be represented or protected by any other party to the proceedings, the Petitioner has the right to be made a party.

2. Interest of the Petitioners.

The Petitioner is a non-profit, environmental organization with 17,000 paid members in British Columbia dedicated to the search for and implementation of direct peaceful solutions to the critical problems of environmental preservation.

The Petitioner has offices in Vancouver, British Columbia, for the purpose of administering the affairs of the Petitioner,

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co-ordinating environmental awareness programs and raising funds for the financing of said programs, to support and conduct research in the area of environmental preservation and to foster public awareness of environmental problems.

The Society is incorporated under the B.C. Societies Act as a non-profit society.

The aims and objectives of the Petitioner are to develop principles and techniques of ecological management and to foster the development of environmental awareness so as to:

- a) promote an understanding of the natural world.
- b) stimulate practical, intelligent and non-violent action to preserve the integrity of life sustaining ecosystems.

3. Effect of these proceedings on the Petitioner's interest.

The Petitioner contends that construction of this project may have a direct and adverse impact upon the Petitioner's members and give rise to the following concerns:

- i. Airborne radioactive contamination spreading to the Province of British Columbia could adversely affect the public health of the members of the Petitioner.
- ii. The necessity for the evacuation of members for safety from such contamination.

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- iii. The necessity of a co-ordinated evacuation of members along with United States citizens.
 - iv. Harm to Canadian fishing interests both sports and commercial.
 - v. Effects of Canadian geological and seismographic activity on the construction project and consequential hazards arising from same.
 - vi. Potential harmful effect on migratory birds and especially the bald eagle populations in the area.
 - vii. Harm to property and agricultural interests of members due to crop, livestock, water, air, and soil contamination due to radioactive leakage.
- The areas of British Columbia closest to the project are essential food and milk producing lands as most of British Columbia is non-arable and said contamination may not only have a direct adverse affect on the said interests of members but may also give rise to consequential increased costs of food and necessities of life.

4. Effect of any possible Order entered.

The Petitioner is an informed and well-recognized body representing the genuine concerns of its members and of residents of British Columbia in general regarding any possible effects of these proceedings on their interests. Unless the Petitioner is

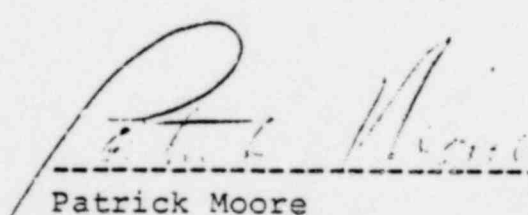
granted standing, these interests will not be represented and therefore will not be shown the proper and necessary consideration required by the relevant federal regulations. The Petitioner feels that the limited appearance which has already been granted to the Petitioner was an inadequate opportunity to fully present and protect the concerns of its members.

5. Untimeliness of the Petition

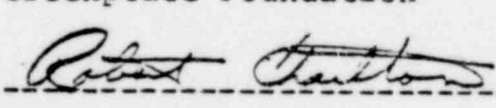
- a) Good cause due to lack of notice.
 - i. Notice was only published in the United States of America.
 - ii. Upon receiving informal notice through the media on 18 June, 1979, the Petitioner immediately contacted the Commission by letter. The fact that the plans for the Sedro Woolley nuclear plant were treated as a front page news story by the largest British Columbia daily newspaper attest to the lack of any publicity formal or informal in British Columbia prior to June 18, 1979.
 - iii. Upon obtaining legal counsel in August of 1979 and being informed by said Counsel of the formalities required by Federal regulations, this Petition is immediately forthcoming.
- b. There are no other means for the Petitioner's interests to be represented as only the Petitioner is best informed and best able to recognize and represent factors affecting its unique interests.

- c) Data on Canadian geology and seismographic activity, Canadian fishing interests, Canadian civil defence and public welfare, will allow a more complete and comprehensive overview of the effects of the project.
- d) Other parties will not be representing Canadian interests, which involve different cultural, legal and social values.
- e) The participation of the Petitioner should not unduly delay the Hearings as the Petitioner will not unduly broaden the issues but will simply bring more vital information and another perspective to bear on the terms of reference and issues already defined by the Inquiry.

WHEREFORE the Petitioner prays that this Petition be granted. Dated this 13th Day of September 1979.



Patrick Moore
President,
Greenpeace Foundation



Robert Charlton, Esq.
Deverell, Harrop
2 Gaoler's News, Gastown,
Vancouver, British Columbia.
Solicitor for the Petitioner

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