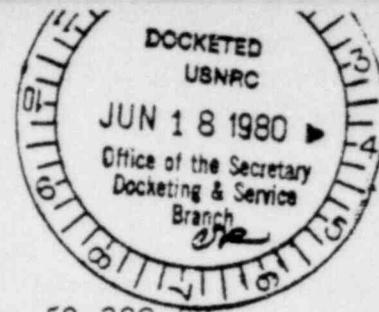


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
CONSUMER POWER COMPANY)
Midland Plant, Units 1 and 2)

Docket No. 50-329-0m
No. 50-330-0M

PETITION TO INTERVENE

Petitioner, Carol Gilbert, petitions to intervene in this proceeding pursuant to Section 2.714 and other pertinent sections of this Nuclear Regulatory Commission's Rules of Practice and states:

I

IDENTIFICATION OF PETITIONER
AND ITS INTERESTS TO BE AFFECTED

Carol Gilbert

1. Carol Gilbert is a resident of Saginaw, Michigan interested in the dissemination of information and stimulation of public awareness and involvement in the study of nuclear power and alternative sources of safe, electrical energy generating sources.

Carol Gilbert resides within twenty five miles of the Midland plant.

This petitioner has analyzed and studied to the extent that information has been available the proposed Midland plant and is concerned that the order for modification of construction permits for Midland Plant, Units 1 and 2 will result in an unsafe and inefficient exercise of the use of atomic energy, that it will create deleterious and adverse effects upon the Cities of Midland, Saginaw, Bay City, other parts of Michigan and elsewhere; will contribute to and create adverse environmental effects which can be avoided; and will result in irretrievable and irreversible commitments of natural and other resources, which, considering all of the alternatives and circumstances including the alleged need for electrical power, would not be advantageous.

II

INTERESTS ADVERSELY AFFECTED
BY ACTION OF THE COMMISSION

2. Based upon the interests and concerns of the petitioner identified in (I) above, one or more of the direct interests of the petitioner will be adversely affected by the order for modification of construction permits for Midland Plant, Units 1 and 2. These interests and how they may be affected are as follows:

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Acknowledged by card. 6-19-80, mu

(a) The health and safety interests of petitioner will be affected by the excessive settlement and soil deficiencies of the diesel generator building through releases of radiation by an accident at the plant.

(b) Radiation releases as specified in (a) above will adversely affect the property interests (both real and personal) of petitioner residing within twenty five miles from the plant.

(c) Radiation releases as specified in (a) above will adversely affect the mental and physical health of petitioner, resulting in medical bills and the shortening of lifespan.

(d) The economic interests of the petitioner who is a ratepayer of Consumer Power Company will be adversely affected due to the raise in rates that will be caused by operation (or inability to operate) of the proposed plant.

WHEREFORE, Petitioner requests that a hearing be held on order for modification of construction permits and that she be permitted to intervene in the proceedings.

Respectfully submitted,

Carol Gilbert
Carol Gilbert

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
CONSUMER POWER COMPANY)
Midland Plant, Units 1 and 2)

Docket No. 50-329-OM
No. 50-330-OM

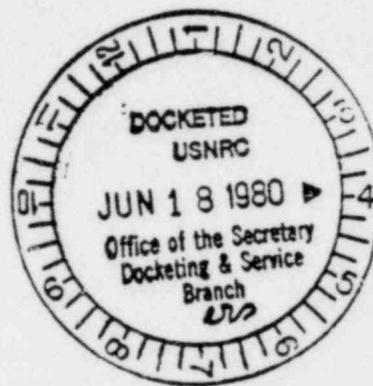
CERTIFICATE OF SERVICE

I hereby certify that I have served copies of the foregoing document entitled "Petition to Intervene" by deposit in the United States mail, first class this 16th day of June, 1980 on the following:

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Branch

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

Michael I. Miller, Esq.
Isham, Lincoln and Beale
One First National Plaza
Chicago, Illinois 60690



Carol Gilbert
Carol Gilbert

On this 16th day of June, 1980, before me personally appeared Carol Gilbert, to me known to be the person described in and who executed the foregoing instrument, and acknowledge that she executed the same as her fact act and deed.

My commission expires: 11-5-1983

June 16, 1980
Date

Mary Lou VanWormer
Notary Public Mary Lou VanWormer
Exp: 11-5-1983
Saginaw County, Michigan