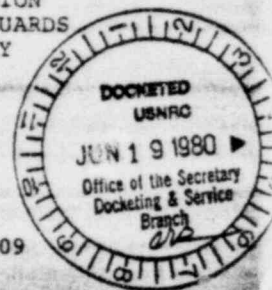


BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

URANIUM FUEL LICENSING BRANCH



APPLICATION of Westinghouse *
Electric Corporation for a *
Special Nuclear Material * DOCKET NO. 70-2909
License for the Alabama *
Nuclear Fuel Fabrication *
Plant to be located near *
Prattville, Alabama *

AMENDED PETITION FOR LEAVE TO
INTERVENE AND REQUEST FOR A HEARING

Comes now the Petitioner, The Safe Energy Alliance of Central Alabama, Inc. (hereinafter "SEACA") and hereby files this amended petition for leave to intervene in the above-styled and numbered proceeding and states unto this Honorable Commission as follows:

1. The petitioner is a duly-incorporated non-profit corporation, having been properly incorporated in the Office of the Judge of Probate, Montgomery County, Alabama on June 10, 1950.
2. The petitioner has been authorized by 18 of its members to represent them in opposing the construction and operation by Westinghouse Electric Corporation of a nuclear fuel fabrication plant to be located near Prattville, Alabama. All such members have cognizable interests as more specifically stated in Exhibits I and II attached hereto and incorporated herein. One set of said members, consisting of 10 in number, have previously filed individual petitions to intervene on April 7, 1980 and by the pleading embodied in Exhibit I have authorized and designated SEACA to represent its common interests in the above-styled proceeding. The second set of said members, consisting of 8 in number, have not previously filed individual petitions but all of said members share the same common interests of the first set of members, and all have duly authorized and designated SEACA to represent their interests. See Exhibit II attached hereto.
3. All of the individuals named in the two pleadings attached hereto as Exhibits I and II are members of SEACA and all live and work in the vicinity of the proposed site of the Westinghouse plant in a close proximity of less than 50 miles from the site. In

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addition, those individual members of SEACA named in Exhibits I and II have the following cognizable interests which would be affected by a release of radiation into the environment:

(a) The named SEACA members would be affected by any release of radiation into the environment by the proposed Westinghouse nuclear fuel fabrication plant to be located in Prattville. This environment includes air, ground, and water, especially the Alabama River.

(b) The named SEACA members would be affected by any accident involving transportation of uranium to the proposed facility or transportation of nuclear fuel pellets from the facility.

(c) The named SEACA members would be affected by releases of radiation from waste storage containers to be located at the proposed facility.

(d) The named SEACA members would be affected by any accident or other incident involving the proposed Westinghouse plant which occurred as the result of sabotage, geological upheavals, flooding, tornadoes, or for any other causes.

(e) The named SEACA members' enjoyment of their property may be adversely affected by the construction and operation of the proposed Westinghouse plant.

4. One general purpose of SEACA which is stated in Article II(a) of its Articles of Incorporation is:

"Promote a comprehensive educational program educating the public of Alabama as to the benefits of safe energy and as to the hazards of unsafe energy sources, including especially those which emit radioactive wastes."

5. Another specific purpose of SEACA stated in Article II(b) of its Articles of Incorporation is:

"File a petition to intervene before the United States Nuclear Regulatory Commission in the application of Westinghouse Electric Corporation for a Special Nuclear Material license for the Alabama Nuclear Fuel Fabrication plant to be located near Prattville, Alabama for the purpose of opposing said license and plant as being detrimental to the health and life interests of the people of Central Alabama and other forms of animal and plant life in said vicinity."

6. As is indicated by Exhibit III attached hereto and incorporated herein, the president of SEACA, namely Robert H. Campbell, has been authorized by the Board of Directors of SEACA to sign this petition in the name of SEACA.

7. The petitioner should be permitted to intervene in this cause because the interests of petitioner's members may be affected by the results of the proceeding in all the aspects listed in paragraph #3. Any order which may be entered in the proceedings may affect Petitioner's members' safety, health and enjoyment of property.

8. Pursuant to S2.714(a)(3)(b), Petitioner will file a supplement which specifies with particularity the contentions with regard to each aspect on which intervention is requested. Such supplement will be filed not later than 15 days prior to any pre-hearing conference.

9. Pursuant to S2,714, Petitioner further requests that a hearing be conducted as to all issues raised herein.

6-11-1980
DATE

Safe Energy Alliance of Central
Alabama, Inc. PETITIONER, by
it's president,

Robert H. Campbell
ROBERT H. CAMPBELL

Julian McPhillips
Julian McPhillips
Attorney at Law
P.O. Box 64
Montgomery, Ala. 36101
(205)-262-1911
For the Petitioner

516 So. Perry St.
Address
Montgomery, Alabama 36104
City, State Zip
(205)-262-0740
Telephone

VERIFICATION

I, the above-named petitioner, believe the foregoing statements to be true and correct in every particular.

6-11-1980
DATE

Safe Energy Alliance of Central
Alabama, Inc., Petitioner, by
its president

Robert H. Campbell
ROBERT H. CAMPBELL

STATE OF ALABAMA

COUNTY OF MONTGOMERY

Before me undersigned Notary Public, appeared Robert A. Campbell, known to me, who did sign the above verification as testament that his statements in the foregoing petition are true and correct in every particular, on this the 11th day of June, 1980.

Julian McPhillips
NOTARY PUBLIC

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Amended Petition For Leave to Intervene and Request For a Hearing have been served on the following at the addresses noted:

John F. Wolf, Esq., Chairman
Atomic Safety and Licensing Board
3409 Shepherd Street
Chevy Chase, MD 20015

Dr. Harry Foreman Member
Atomic Safety and Licensing Board
Box 395, Mayo
University of Minnesota
Minneapolis, MN 55455

Dr. Martin J. Steindler, Member
Atomic Safety and Licensing Board
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Il 60439

Barton Z. Cowan, Esq.
John R. Kenrick, Esq.
Eckert, Seamans, Cherin & Mellot
Forty-Second Floor
600 Grant Street
Pittsburgh, Pa. 15219

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

on this the 12th day of June, 1980.

Donald R. Marcucci, Esq .
Law Dept.
Westinghouse Electric Corp.
P.O. Box 355
Pittsburgh, PA 15230

Sherwin Turk, Esq.
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

David L. Allred
231 Oak Forest Drive
Montgomery, Ala. 36109

Dr Ira L. Myers, M.D.
State Health Officer
State of Alabama
Dept. of Public Health
State Office Bldg.
Montgomery, Ala. 36104

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Julian McPhillips
Julian McPhillips

BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

URANIUM FUEL LICENSING BRANCH

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Plant to be located near *
Prattville, Ala. *

DESIGNATION-AUTHORIZATION OF THE
SAFE ENERGY ALLIANCE OF CENTRAL
ALABAMA, INC. TO REPRESENT INTERESTS OF
THE NAMED INDIVIDUAL PETITIONERS

We, the individuals named and addressed at the bottom of this pleading, do hereby authorize and designate the Safe Energy Alliance of Central Alabama, Inc. and its president Robert H. Campbell to serve as a single spokesman to represent our common interests in the above-captioned proceedings, and we further authorize and direct attorney Julian McPhillips to continue as our individual and corporate attorney in his representation of the Safe Energy Alliance of Central Alabama, Inc. (hereinafter "SEACA"). As grounds therefore, we show unto this Honorable Commission the following:

1. We all filed petitions for leave to intervene and requested a hearing in the above-captioned proceedings on April 7, 1980, in which we all stated as petitioners that:

A. Petitioner lives and works in close proximity to the proposed facility.

B. Petitioner would be affected by any release of radiation into the environment.

C. Petitioner would be affected by any accident involving transportation of uranium to the facility or of fuel pellets from the facility.

D. Petitioner would be affected by releases of radiation from waste storage containers which are to be located at the proposed facility.

E. Petitioner would be affected by any accident which occurred as a result of sabotage, geological upheavals, flooding, tornadoes, or for any other causes.

F. Petitioner's enjoyment of his property may be affected by the proposal.

2. We all have been represented by attorney Julian McPhillips and wish to continue to be represented by him.

3. We are all members of the SEACA and believe that SEACA and its president Robert H. Campbell and other officers will well represent our interests.

4. We hereby attest this pleading by our respective signatures above our stated name and notarized below.

<u>NAME</u>	<u>RESIDENCE</u>	<u>WORK LOCATION</u>
<u>Randy Arosov</u> Randy Arosov	1245 Glen Gratton Montgomery, Ala. 36111	Sunshine Grocery Montgomery County, Alabama
<u>Charles O. Butler</u> Charles O. Butler	P.O. Box 66 Elmore, Ala. 36075	Elmore, Ala.
<u>Marilyn F. Butler</u> Marilyn F. Butler	P.O. Box 66 Elmore, Ala. 36075	Elmore, Ala.
<u>Robert H. Campbell</u> Robert H. Campbell	P.O. Box 11731 Montgomery, Ala. 36116	Montgomery, Ala.
<u>Sarah (S.N.) Draut</u> Sarah (S.N.) Draut	2296 Country Club Dr. Montgomery, Ala. 36106	2296 Country Club Dr. Montgomery, Ala. 36106
<u>Robert E. Ely</u> Robert E. Ely	3211 Wilmington Road	Alabama State Univ.
<u>John A. Johnson</u> John A. Johnson	50 Lamar Ave. Seima, Dallas County, Ala. 36701	Alabama State Dept. of Education Montgomery County, Ala.
<u>Linda G. Moore</u> Linda G. Moore	1801 W. 2nd Street Montgomery, Ala. 36106	Sunshine Grocery Montgomery County, Ala.
<u>Ann Toledo</u> Ann Toledo	2537 Bay Street Montgomery, Ala. 36107	Southlawn Elementary School - Montgomery County, Alabama
<u>William Carroll</u> William Carroll	320 W. Magnolia Auburn, Alabama	246 South Port Montgomery, Ala.

COUNTY OF MONTGOMERY

STATE OF ALABAMA

Before me, the undersigned Notary Public, appeared the individuals named and addressed above, who, after being duly sworn, did sign the above as a designation-authorization of SEACA to represent their interests in the above-captioned proceedings.

June 12, 1980
Date

Julian McPhillips
Julian McPhillips

BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

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DESIGNATION-AUTHORIZATION OF THE
SAFE ENERGY ALLIANCE OF CENTRAL
ALABAMA, INC. TO REPRESENT INTERESTS OF
THE NAMED INDIVIDUAL MEMBERS

We, the individuals named and addressed at the bottom of this pleading, do hereby authorize and designate the Safe Energy Alliance of Central Alabama, Inc. and its president Robert H. Campbell to serve as a single spokesman to represent our common interests in the above-captioned proceedings, and we further authorize and direct attorney Julian McPhillips to act as our individual and corporate attorney in his representation of the Safe Energy Alliance of Central Alabama, Inc. (hereinafter "SEACA"). As grounds therefore, we show unto this commission the following:

1. We all filed petitions for leave to intervene and requested a hearing in the above-captioned proceedings on April 7, 1980, in which we all stated as petitioners that:

A. Petitioner lives and works in close proximity to the proposed facility.

B. Petitioner would be affected by any release or radiation into the environment.

C. Petitioner would be affected by any accident involving transportation of uranium to the facility or of fuel pellets from the facility.

D. Petitioner would be affected by releases of radiation from waste storage containers which are to be located at the proposed facility.

E. Petitioner would be affected by any accident which occurred as a result of sabotage, geological upheavals, flooding, tornadoes, or for any other causes.

F. Petitioner's enjoyment of his property may be affected by the proposal.

2. We all desire to be represented by attorney Julian McPhillips.

3. We all believe that SEACA, its president and other officers, will well represent our interests.

4. We hereby attest this pleading by our respective signatures above our printed name and notarize below.

<u>NAME</u>	<u>RESIDENCE</u>	<u>WORK LOCATION</u>
<u>Cathaly Donelson</u>	855 Park Ave Montgomery, AL	Alabama Historical Commission
<u>Susan Sinker</u>	651A Hubbard St. Montgomery	student - A.U.M.
<u>W. Frank Mues Jr</u>	1634 S. Court St, Montg, AL 36104	Al. Dept. Public Health State Health Dept.
<u>John P. [unclear]</u>	651 HUBBARD ST MONTGOMERY, AL 36106	100 COMMERCE MONTGOMERY, AL
<u>Edward G. [unclear]</u>	3354 Drexel Rd. Montgomery, AL 36106	C.H. [unclear] Jr., ARCHITECT
<u>Larris R. Curry</u>	Rt. 1 Box 249 P. Rd MONTGOMERY, AL 36064	449 S. Montgomery Montgomery, AL 36104
<u>[unclear]</u>	424 Park St Montgomery, AL 36103	516 So PERRY ST MONTGOMERY, AL 36104
<u>[unclear]</u>	322 [unclear] St Montgomery, AL 36104	516 So Perry St Montgomery, AL 36104

COUNTY OF MONTGOMERY

STATE OF ALABAMA

Before me, the undersigned Notary Public, appeared the individuals named and addressed above, who, after being duly sworn, did sign the above as a designation-authorization of SEACA to represent their interests in the above-captioned proceedings.

June 12, 1980
Date

Julian McPhillips
Julian McPhillips

SAFE ENERGY ALLIANCE
OF
CENTRAL ALABAMA
516 So. Perry St.
Montgomery, Alabama 36104

Exhibit III
June 10, 1980

RESOLUTION OF THE BOARD OF DIRECTORS
OF SAFE ENERGY ALLIANCE OF CENTRAL
ALABAMA, INC. (SEACA) AUTHORIZING ROBERT
H. CAMPBELL, AS PRESIDENT OF SEACA, TO
SIGN PETITION TO INTERVENE OF SFACA

We, the undersigned members of the Board of Directors of the Safe Energy Alliance of Central Alabama, Inc., do hereby resolve, authorize, and direct Robert H. Campbell, as president of the Safe Energy Alliance of Central Alabama, Inc. (SEACA) to sign in the name of SEACA a petition for leave to intervene and request for a hearing in the application of Westinghouse Electric Corporation for a special nuclear material license for the Alabama Nuclear Fuel Fabrication plant to be located near Prattville, Alabama, said intervention to be before the Uranium Fuel Licensing Branch of the U.S. Nuclear Regulatory Commission, Office of Nuclear Material Safety and Safeguards, Division of Fuel Cycle and Material Safety.

Board of Directors of
Safe Energy Alliance of
Central Alabama, Inc.

Randy Aronov
Randy Aronov

Cathlyn Donaldson
Cathlyn Donaldson

Frank Mills
Frank Mills

Albert Jackson Naftel
Albert Jackson Naftel

Robert H. Campbell
Robert H. Campbell