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 License for the Alabama Nuclear Fuel Pabrication Plant to be located near Prattville, Ala.

DOCKET NO. 70-2909

DOCKETED

USNEC JUN 1 9 ISSO • Office of the Secretary Docketing & Service

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MOTION REQUESTING ORDER THAT PETITIONER
SEACA BE RELIEVED OF THE REQUIREMENT
OF C.F.R. \$2,708(d) THAT ONE ORIGINAL AND
20 CONFORMED COPIES OF ALL PLEADINGS BE
FILED WITH THE COMMISSION

Comes now the petitioner The Safe Energy Alliance of Central Alabama ("ereinafter "SEACA") and moves this Honorable Commission to relieve it of the requirement of C.F.R. S2.708(d) that one original and 20 conformed copies of all pleadings be filed with the Commission. As grounds therefore, the petitioner shows unto the Commission the following:

- SEACA is a non-profit corporation with very limited resources and cannot afford the expense and burden of reproducing 20 additional copies of all pleadings sent to the Commission, especially when so many other copies of all pleadings must be mailed.
- 2. The petitioner's attorney Julian McPhillips has conferred by telephone with U.S. Nuc. Reg. Commission attorney
 Sherwin Turk about this matter and Mr. Turk suggested this motion as the proper way to proceed.

WHEREFORE, premises considered, the petitioner prays that this Honorable Commission will relieve it of the requirement of C.F.R. S2.708(d) that 20 copies of all pleadings be filed with the Commission and instead suffice it that petitioner need file only one original of all pleadings with the Commission.

Respectfully submitted,

THE SAFE ENERGY ALLIANCE OF CENTRAL ALABAMA, INC.

9503 9 Shafer - 1 Attorney at Law P.O. 80x 64 Montdomery, Ala. 36101 (205) -262-1911

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion has been served on the following at the addresses noted:

John F. Wolf, 2sg., 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 Ave. Argonne, IL. 60439

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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 12 th day of June, 1980.

Conald R. Harcucci, Esq.

Law Dept.

Westingnouse Electric Corp.
P.O. Box 355
Pittsburgh, Pa. 15230

Sherwin Turk, Esq. U.S. Nuclear Regulatory Comm. Washington, D.C. 2055

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

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Julian McPhillips