

Consequently, they are not only not funded to participate in this intervention, but also lack the research staff, copying machines, typists, and time with which to work at the required speed.

They, quite frankly, lack the financial resources to comply with some of the demands of both G.E. and the NRC staff. It was, no doubt, with an awareness of this lack that G.E. requested of them copies of all of the materials they used in formation of contentions. They had already made it clear in both their amended contentions and re-amended contentions that they were not financially able to supply these materials.

They have been unable to find expert witnesses who are willing to testify at minimal cost, particularly since they are not able to supply any information as to when hearings are likely to take place.

Furthermore, they are upset at two claims which G.E. makes: one, that Rorem et al. have contributed nothing to the relicensing but delays. They would like to remind the Board that most of the delays have been on the part of the NRC staff due to procedural changes and changes within the Commission. Further, the language and content of two

contentions are largely those of Rorem et al. They also contributed their insistence that the hearings take place near the site of the G.E. Morris Operation.

Secondly, G.E. claims that Rorem et al. shows a lack of interest by not being in attendance when depositions are taken. This is not only untrue, but it is unfair to make such an allegation. Intervenors have families, and jobs, are far from the places in which the depositions are being taken, and are not paid for time and expenses to attend such occasions.

Intervenors feel that it is already made extremely difficult for citizens to involve themselves in the licensing or re-licensing process. A citizen who wishes to participate must first of all have access to, and read, the Federal Register. He must file, on time, and in the proper format, a petition for leave to intervene. He must have access to the information as to how this is to be done properly, or he must have the financial means to hire the services of a lawyer.

If he does not have the money to hire a lawyer, he must be able to pay the costs of paper, reprinting, postage, phone, gas, and child-care in order to participate.

As the only individual citizen participants, intervenors wish to continue in this proceeding even if they are only able to cross-examine those witnesses presented by the other parties.

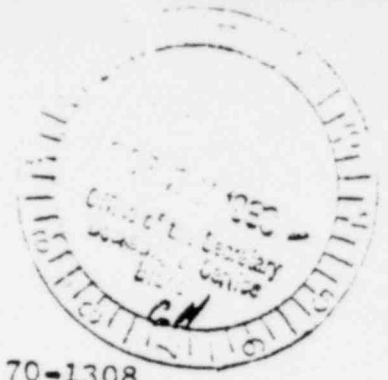
In addition, the new regulation, 10 CFR Part 72, may influence the Safety Evaluation Report and may therefore influence the contentions accepted by the Board.

If the Board is willing, intervenors will file immediately their answers to the interrogatories propounded both by the NRC staff and by G.E., insofar as they are complete at this time.

Respectfully submitted,

Bridget Little Rorem
Bridget Little Rorem

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
GENERAL ELECTRIC COMPANY)
Renewal of Materials License)
No. SNM-1265 issued to G.E.)
Morris Operation Fuel Storage)
Installation)

Docket No. 70-1308

I have sent copies of "Response of Rorem et al. to Motion of G.E. to Dismiss Rorem et al. as Intervenor" to the following, having mailed them from the U.S. Post Office in Kankakee, Illinois, on the afternoon of 24 October 1980:

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