

Nov 9, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of

APPLICATION OF WESTINGHOUSE
ELECTRIC CORPORATION FOR A
SPECIAL NUCLEAR MATERIAL
LICENSE FOR THE ALABAMA
NUCLEAR FUEL FABRICATION
PLANT (ANFFP) TO BE LOCATED
NEAR PRATTVILLE, ALABAMA

DOCKET NO. 70-2909

JOINT MOTION FOR SUBSTITUTION OF NAMED INTERVENOR

Come now Movants David L. Allred and Cathalynn Donelson and request the Atomic Safety and Licensing Board to permit the substitution of Cathalynn Donelson as the named intervenor for David L. Allred with respect to all pleadings and matters heretofore filed and addressed by David L. Allred and as grounds therefor state as follows:

1. David L. Allred and Cathalynn Donelson have jointly worked on all matters heretofore filed in this matter by David L. Allred.

2. Cathalynn Donelson has done much of the work with respect to research into and analysis of the application and environmental report which forms the basis for the proposed contentions heretofore filed by David L. Allred.

3. The interests and concerns of Cathalynn Donelson have been incorporated into the proposed contentions of David L. Allred at her suggestion and with the approval of Donelson and Allred.

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ADD:
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4. The concerns and issues considered and set forth in the pleadings heretofore filed by David L. Allred are the result of joint research, analysis and discussion between Allred and Donelson.

5. Cathalynn Donelson has not filed a petition for intervention heretofore in reliance on the petition and intervention of David L. Allred which adequately set forth her interests and concerns. In the absence of Allred's continued intervention and participation Donelson's interests and concerns will not be protected.

6. David L. Allred must withdraw from participation in the instant proceedings for the following reasons:

A. Petitioner Allred is an Assistant United States Attorney whose case load has increased to the point that he can no longer devote sufficient time to the licensing procedure.

B. Petitioner Allred, as a private individual, does not have sufficient monetary resources to continue his participation in the licensing procedure.

7. David L. Allred and Cathalynn Donelson believe that the intervention heretofore conducted under the name of David L. Allred can be successfully continued to the benefit of all parties and the public interest by Cathalynn Donelson.

8. If this motion is granted, Cathalynn Donelson will voluntarily and knowingly assume the position of David L. Allred and step into his shoes with respect to this matter. Any disabilities, waivers or other steps taken by David L. Allred will be assumed by Cathalynn Donelson.

9. No prejudice to any party will result from the granting of this motion. The best interests of all parties and the public will be advanced by the granting of this motion.

WHEREFORE David L. Allred and Cathalynn Donelson respectfully request that Cathalynn Donelson be permitted to undertake the intervention heretofore conducted in the name of David L. Allred and that her name be substituted for his in this matter.

Respectfully submitted this the
9th day of November, 1980

David L. Allred

Cathalynn Donelson
MOVANTS

VERIFICATION

We, David L. Allred and Cathalynn Donelson, believe the foregoing statements to be true and correct in every particular.

November 9, 1980
Date

David L. Allred

Cathalynn Donelson

STATE OF ALABAMA
COUNTY OF MONTGOMERY

Before me, the undersigned Notary Public, appeared Cathalynn Donelson and David L. Allred, known to me, who did sign the above Motion and Verification as testament that their statements in the foregoing are true and correct in every particular, on this the 9 day of November, 1980.

Wendy H. Allred
Wendy H. Allred, Notary Public
State at Large
Commission Expiration: 1984

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the following named parties by mailing the same to them on this the 10th day of November, 1980.

John F. Wolf, Esq., Chairman
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David L. Albert

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