

Nov 10, 1980

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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, AL

DOCKET NO. 70-2909

PETITION FOR LEAVE TO INTERVENE

Comes now petitioner Cathalynn Donelson and hereby petitions
the Nuclear Regulatory Commission for leave to intervene in
the above-styled and numbered proceeding and states unto the
Nuclear Regulatory Commission as follows:

STANDING

1. Petitioner resides at 855 Park Avenue, Montgomery, Alabama.
2. Petitioner owns property in Montgomery County, Alabama, within five miles of the proposed site of the ANFFP.
3. Petitioner works at the Alabama Historical Commission in Montgomery, Alabama.
4. Petitioner has one child who lives with Petitioner in Montgomery, Alabama.
5. Petitioner and her child are persons whose interest may be affected by the construction and operation of the proposed plant in that:
 - A. Petitioner lives and works in close proximity to the proposed facility;

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B. Petitioner uses recreational facilities which would be affected by the discharge of radioactive materials into the environment by the proposed facility;

C. Petitioner would be affected by any release of radioactive materials into the environment;

D. Petitioner and Petitioner's child would be affected by any accident involving transportation of radioactive materials to the facility or of fuel pellets from the facility;

E. Petitioner and Petitioner's child would be affected by releases of radioactive materials from waste storage containers which are to be located at the proposed facility;

F. Petitioner and Petitioner's child would be affected by any accident which occurred as a result of sabotage, geological upheavals, flooding, tornadoes, or for any other causes;

G. Petitioner's enjoyment of her property may be affected by the proposal.

H. Petitioner's children (born and unborn) would be affected by any release of radioactive materials into the environment by the proposed facility;

I. The childbearing and child-nurturing capabilities and capacities of Petitioner would be affected by any release of radioactive materials into the environment by the proposed facility.

6. Petitioner should be permitted to intervene in this cause because the interests of Petitioner may be affected by the results of the proceeding in all the aspects listed in

paragraph #5. Any order which may be entered in the proceedings or other action by the Nuclear Regulatory Commission in this proceeding may affect Petitioner's and Petitioner's family's safety, health and enjoyment of property.

GOOD CAUSE

1. Petitioner has been informally involved in the licensing procedure for the proposed ANFFP since April, 1980, in that Petitioner has: attended various meetings of the Safe Energy Alliance of Central Alabama, Inc.; attended the Pre-hearing Conference held by the Board on August 21, 1980, in Montgomery, Alabama; attended informal meetings among the parties; and worked closely with Petitioner David L. Allred in the preparation of his pleadings in this matter.

2. Petitioner has spent many hours analyzing the license application and environmental report prepared by Westinghouse Electric Corporation. Petitioner has also contacted scientists and used information provided by them in her research. Finally, Petitioner has provided her work product, including proposed contentions, to David L. Allred who has submitted such work product in his pleadings in this matter.

3. Although Petitioner has been associated with the Safe Energy Alliance of Central Alabama, Inc., said organization has not presented every issue which Petitioner believes should be presented in this matter. Indeed, many of the issues of concern to Petitioner have been advanced by David L. Allred as a result of his incorporation of her work product into his pleadings.

4. Petitioner states that to the best of her knowledge and belief David L. Allred is withdrawing his petition in this matter.

5. Petitioner submits that her interests and concerns together with her efforts in this matter will be lost if David L. Allred withdraws his petition for intervention and Petitioner is not permitted to intervene.

6. Petitioner has not heretofore filed a petition for intervention because she was relying upon the intervention of David L. Allred to advance her concerns and interest.

7. Petitioner submits that no prejudice to any party in this proceeding will result from her intervention, but that the interests of all parties and the residents of Central Alabama will be benefited thereby.

CONCLUSION

For the foregoing reasons Petitioner contends that she should be permitted to intervene in this matter. Petitioner further requests that a hearing be conducted as to all issues raised herein.

Respectfully submitted this the

9th day of November, 1980.

Cathalynn Donelson
PETITIONER

Cathalynn Donelson
855 Park Avenue
Montgomery, AL 36106

VERIFICATION

I, Cathalynn Donelson, believe the foregoing statements to be true and correct in every particular.

November 9, 1980
DATE

Cathalynn Donelson
PETITIONER

STATE OF ALABAMA
COUNTY OF MONTGOMERY

Before me, the undersigned Notary Public, appeared Cathalynn Donelson, known to me, who did sign the above Petition and Verification as testament that her 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: 9/1/84

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 10th day of November, 1980.

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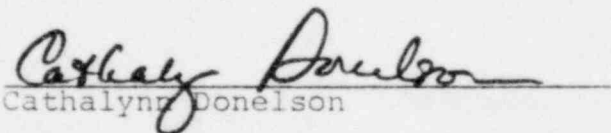
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Cathalyn Donelson