

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of :
WESTINGHOUSE ELECTRIC CORPORATION : Docket No. 70-2909
(Alabama Nuclear Fuel Fabrication :
Plant Special Nuclear Material :
License) :

ANSWER OF WESTINGHOUSE ELECTRIC CORPORATION TO
JOINT MOTION FOR SUBSTITUTION OF NAMED INTERVENOR

Westinghouse Electric Corporation ("Westinghouse") files this Answer in response to a Joint Motion for Substitution of Named Intervenor (the "Substitution Motion") dated November 10, 1980, filed by David L. Allred ("Allred") and Cathalynn Donelson ("Donelson"). Westinghouse believes that with respect to Donelson the Substitution Motion raises the same issues as the untimely Petition for Leave to Intervene (the "Intervention Petition") filed by Donelson on November 10, 1980. Accordingly, with respect to Donelson the response of Westinghouse to the Substitution Motion is included in the Answer of Westinghouse Electric Corporation to Petition for Leave to Intervene of Cathalynn Donelson (the "Westinghouse Answer") filed simultaneously herewith.

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As noted in that Westinghouse Answer, Westinghouse opposes the Donelson Intervention Petition and the attempt to substitute Donelson for Allred as a participant in this proceeding.

With respect to Allred, Westinghouse interprets the Substitution Motion as a motion by Allred to withdraw from all participation in the instant proceeding. Westinghouse does not object to such withdrawal.

Respectfully submitted,

/s/ Barton Z. Cowan

/s/ John R. Kenrick/BZC
Eckert, Seamans, Cherin & Mellott

/s/ Donald R. Marcucci/BZC
Law Department
Westinghouse Electric Corporation

Counsel for
Westinghouse Electric Corporation

Dated: November 24, 1980

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Answer of Westinghouse Electric Corporation to Joint Motion for Substitution of Named Intervenor" were served upon the persons listed on Attachment 1 to this Certificate of Service by deposit in the United States Mail (First Class), postage prepaid, this 24th day of November, 1980.

/s/ Barton Z. Cowan

Barton Z. Cowan

Counsel for
Westinghouse Electric Corporation

ATTACHMENT 1

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Chevy Chase, Maryland 20015

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Dr. Ira L. Myers
State Health Officer
State of Alabama
Department of Public Health
State Office Building
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Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Docketing & Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
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