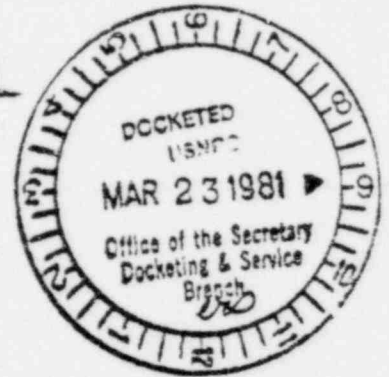


3/16/81
DOCKET NUMBER
PRDD. & UTIL. FAC. 50-440-229



PETITION FOR LEAVE TO INTERVENE

TOD J. KENNEY moves for leave to intervene in this proceeding and in support thereof states as follows:

Said petitioner's permanent residence is 31880 Creekside Drive, Pepper Pike, Ohio 44124, and is a direct Customer of CEI and will be substantially and directly affected by any decision in the above designated docket.

Being within close proximity of the nuclear facility and deriving recreation, aesthetic benefit, retail and economic services and personal relationships from the immediate area, which would be directly affected by decisions of the commission, supports said petitioner in sufficient standing for this proceeding.

Nonintervention by said petitioner would be a deprivation of constitutional and statutory rights provided to members of the concerned public.

AND FURTHERMORE:

Said petitioner seeks to bring forth matters for consideration including but not limited to:

An evaluation of the environmental concerns as are mandated by court decision, Calvert Cliffs Coordinating Committee v. AEC, 2 ERC 1779, that licensing boards must give independent review to all NEPA matters in uncontested as well as contested cases.

An evaluation of the required study of the alternatives to this project.

An evaluation of the emergency plans, with special regard to the proximity of schools and hospitals, and that such a plan be thoroughly tested.

An evaluation of the need for this facility with attention paid to updated electrical demand forecasts, with consideration of new conservation actions evident in laws, codes, practices and lifestyles.

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Implementation of a continuing monitoring program for air, water, soil, and biological species including the human population.

An evaluation of the full operation of the facility including all aspects of the fuel cycle such as mining, fuel manufacturing, transportation, and waste management.

Establishment of a system where the cost of the operation of this plant, if license is issued, should be clearly marked and differentiated from other costs on the customer's bill.

A ruling be made that if the license is issued that a Sunshine clause should be included where the operation of the plant would be reviewed by the public and the Commission every five years, and that the license may be revoked or continued on the basis of a full evaluation.

AND IN ADDITION:

Said petitioner has shown specific interest in this matter and also has interest in matters and information from a review of the reports and documents established in this process and other documents to be obtained by discovery.

That by reason of the foregoing said petitioner has a substantial interest in and will be substantially affected by the decision in the above designated docket.

Wherefore, your petitioner herewith respectfully prays that:

Having submitted this petition in good faith, showing sufficient standing and specific interest to be affected that leave be granted to it to intervene and become a party to the above-styled proceeding.

Dated this 16th day of March, 1981.

Tod J. Kenney
Tod J. Kenney

Tod J. Kenney
31880 Creekside Drive
Pepper Pike, Ohio 44124