

Elizabeth B. Entwisle, Esq.
8118 Hartford Ave.
Silver Spring, MD 20910

May 5, 1981

Louis J. Carter, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing Board
23 Wiltshire Road
Philadelphia, PA 19151



Dear Judge Carter:

Enclosed please find, as requested at the special pre-hearing conference on May 1, 1981, a copy of the following:

- (1) "Position of Petitioner on Unstipulated Contentions;"
- (2) "Petition for Waiver of Commission Regulations" and accompanying Affidavit;
- (3) "Amendment to Unstipulated Contentions;" and
- (4) Applicant's Environmental Release Report (covering the period 1 Jan 1970 - 30 Sep 1971) and cover letter.

You also requested the full citation for the United States Supreme Court case from which I quoted the dissenting language of Mr. Justice Douglas. The citation is: Morningside Renewal Council, Inc. and Riverside Democrats, Inc. v. United States Atomic Energy Commission, 417 U.S. 951, 41 L. Ed. 2d 672, 94 S. Ct. 3080 (1974).

I hope this information is useful to you.

Sincerely,

Elizabeth Entwisle
Counsel for Petitioner

cc: Service list

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