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November 2, 1982  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
REGULATORY & SERVICE  
DIVISION

In the Matter of )  
 ) Docket Nos. 50-338/339-OLA-2  
VIRGINIA ELECTRIC )  
AND POWER COMPANY )  
  
(North Anna Power Station,  
Units 1 and 2)

APPLICANT'S ANSWER TO PETITION FOR LEAVE  
TO INTERVENE OF LOUISA COUNTY, VIRGINIA  
AND THE BOARD OF SUPERVISORS OF LOUISA COUNTY

Applicant, Virginia Electric and Power Company  
("Vepco"), files the following Answer to the Petition for  
Leave to Intervene filed by Louisa County and the Board of  
Supervisors of the County (collectively, the "County"),  
which was served on Vepco by mail on October 22, 1982.

I.

Petitioner's Interest

The County has adequately established an interest in  
the proceeding, and how that interest may be affected by the  
results of the proceeding, in accordance with 10 C.F.R.  
§ 2.714 (1982).

II.

Petitioner's Contentions

The County has adequately stated at least one specific  
aspect of the subject matter of this proceeding as to which

it wishes to intervene. Under 10 C.F.R. § 2.714(a)(3) (1982), the County may amend its petition up to 15 days prior to the holding of the first prehearing conference. Pursuant to 10 C.F.R. § 2.714(b)(1982), the County has until 15 days prior to the first prehearing conference to file a list of the contentions that it will seek to have litigated in this proceeding and a reasonably specific statement of the basis for each such contention. Applicant will respond to the Petitioners' contentions after the list has been filed. Applicant wishes to reserve the right to raise at that time any arguments that address the admissibility of the contentions, including any arguments that it might have made at this time.

### III.

#### Consolidation

Applicant has no objection to consolidating this proceeding with the ongoing proceeding in which Applicant has applied for amendments to its North Anna operating licenses that would authorize storage of spent fuel from Applicant's Surry Power Station in the North Anna Units 1 and 2 spent fuel pool. Applicant does not agree, however, that either shipment of spent fuel from Surry to North Anna or expansion of a North Anna Unit 3 spent fuel pool is an appropriate subject for consideration in either proceeding. Applicant will address those issues, if they are raised, when the County has filed the list required by 10 C.F.R. § 2.714(b)(1982).

Respectfully submitted,  
VIRGINIA ELECTRIC AND POWER  
COMPANY

*Marcia R. Gelman*

By:           /s/ Marcia R. Gelman            
          Marcia R. Gelman, Counsel

Of Counsel

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Dated: November 2, 1982

CERTIFICATE OF SERVICE

I hereby certify that I have this day served Vepco's Answer to Petition for Leave to Intervene of Louisa County and the Board of Supervisors of Louisa County upon each of the persons named below by depositing a copy in the United States mail, properly stamped and addressed to him at the address set out with his name:

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Chief, Docketing and Service Section

Sheldon J. Wolfe, Chairman  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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By: *Marcia R. Gelman*  
/s/ Marcia R. Gelman  
Marcia R. Gelman, Counsel for  
Virginia Electric and Power  
Company

Dated: November 2, 1982