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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 NOV 24 A11:14

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

SECRETARY
OFFICE OF PUBLIC AFFAIRS
SERVICE
BRANCH

In the Matter of)	
)	
PUGET SOUND POWER & LIGHT COMPANY, et al.)	Nos. STN 50-522 & 50-523
)	
(Skagit/Hanford Nuclear Project, Units 1 and 2))	Date: November 22, 1982

MOTION OF THE NATURAL RESOURCES DEFENSE COUNCIL, INC.
TO ALTER DESIGNATION OF LEAD PARTIES

Intervenor Natural Resources Defense Council, Inc. requests the Licensing Board to alter the Lead Party designation established for Contention 3 in the Board's Memorandum and Order dated November 2, 1982. As phrased in the Board's Order, Contention 3 reads:

3. Applicants have misapplied the National Environmental Policy Act (NEPA), 42 U.S.C. 432 [sic], by rejecting the following alternatives which are available, environmentally preferable and more economical than the proposed Skagit/Hanford Nuclear Project: wind power, biomass, solar, conservation, co-generation, low-head hydro, ocean temperature differences and alcohol fuel. Further, Applicants have followed a very narrow view of this Act by considering each alternative separately. Applicants must also be required to consider combinations of various appropriate technologies as alternatives to the proposed project.

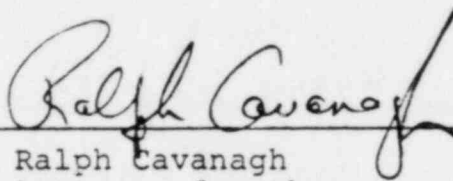
The Board designated the Coalition for Safe Power as the Lead Party. This Motion requests substitution of NRDC as Lead Party, for the following reasons:

1. All intervenors, including the Coalition for Safe Power, concur that such a substitution is desirable.

2. NRDC, among all the intervenors, has developed and demonstrated the greatest expertise on cost-effective, environmentally preferable alternatives to Skagit/Hanford and comparable plants. See, e.g., Amended Petition of NRDC for Leave to Intervene (April 5, 1982), pp. 7-10 and Exhibits 1, 2, 3, and 5 (describing and excerpting NRDC publications on "least-cost" energy strategies); A Model Electric Power and Conservation Plan for the Pacific Northwest (November 1982) (395-page publication authored by NRDC staff, which focuses on potentials for cost-effective conservation, solar, cogeneration, and other alternatives to large-scale generating facilities).

3. NRDC is prepared to submit both documentary evidence and expert testimony in support of Contention 3, as indicated in Amended Petition of NRDC for Leave to Intervene (April 5, 1982), pp. 9-10 & Exhibit 5 (qualifications of Dr. David Goldstein); Response of the Natural Resources Defense Council to Applicants' First Set of Interrogatories (September 17, 1982), pp. 3-9 (identifying documents and witnesses NRDC intends to offer in support of its fourth contention, which is subsumed in Contention 3 of the Licensing Board's Order).

Respectfully submitted,

A handwritten signature in cursive script, reading "Ralph Cavanagh". The signature is written in black ink and is positioned above a horizontal line.

Ralph Cavanagh
Attorney for the
Natural Resources Defense Council, Inc.
25 Kearny Street
San Francisco CA 94108
(415)421-6561