

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	}	Docket No. 50-322
Consideration of Issuance of Amendment	}	License No. NPF-82
To Facility Operating License and	}	
Proposed No Significant Hazards	}	
Consideration Determination and	}	
Opportunity for Hearing; Long Island	}	
Lighting Co. (Defueled Operating	}	
License) (55 Fed. Reg. 34098,	}	
August 21, 1990)	}	

PETITIONERS' JOINT NOTICE OF INTENT TO
PETITION FOR REVIEW AND REQUEST FOR STAY

The Shoreham-Wading River Central School District and Scientists and Engineers for Secure Energy, Inc. (jointly "Petitioners"), by counsel, give notice of their intent to file a petition for review of any final determination by the Commission that the Long Island Lighting Company's ("LILCO") application for a possession only license for the Shoreham Nuclear Power Station involves no significant hazards consideration and that the amendment shall be issued before hearing in the above-captioned matter. See U.S.App.D.C. General Rule 7(h)(1)(B).

If the Commission does make such a final determination, Petitioners respectfully request that the amendment not issue until fifteen (15) working days after publication of that final determination in the Federal Register, in order to allow Petitioners to seek and obtain a stay of the determination and the order issuing the license in the U.S. Court of Appeals for

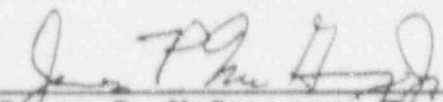
the District of Columbia Circuit. See U.S.App.D.C. General Rule 7(h)(1)(A).

Petitioners submit that good cause for such a stay of the issuance of the proposed possession only license amendment is shown by the facts that such a stay will preserve the status quo pending expedited consideration of Petitioners' Emergency Motion by the Court, will not seriously inconvenience LILCO due to the short period of time in question, and the public interest favors a swift, independent judicial consideration of the need for a stay pending review.

WHEREFORE, Petitioners respectfully urge the Commission, in the event of the issuance of a final no significant hazards consideration determination with respect to the LILCO application for a possession only license for Shoreham, to stay the issuance of that license for fifteen working days after publication of the determination and decision to issue the license in the Federal Register.

Respectfully submitted,

February 11, 1991



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CERTIFICATE OF SERVICE

I hereby certify that one copy of the Petitioners' Joint Notice of Intent to Petition for Review and Request for Stay is being served upon the following by first-class mail, postage prepaid on this 11th day of February, 1991:

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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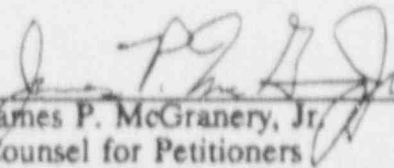
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