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NUCLEAR REGULATORY COMMISSION UNITED STATES OF AMERICA

Application for a facility operating license from the Niagara Mohawk Power Corporation, acting for itself and as agent for Rochester Gas and Electric Corporation, Central Hudson Gas & Electric Corporation, New York State Electric & Gas Corporation and Long Island Lighting Company for a facility operating license with respect to Nine Mile Point Nuclear Station, Unit 2

) Docket No. 50-410

## PETITION FOR LEAVE TO INTERVENE OF MULTIPLE INTERVENORS

Pursuant to 10 C.F.R. § 2.714 and notice published in the <u>Federal Register</u>, Vol. 48, No. 94, at page 21680, Multiple Intervenors, an unincorporated association of industrial consumers of electric energy with facilities located on the Niagara Mohawk Power Corporation, New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation systems, hereby petitions for leave to intervene in the instant license docket before the Nuclear Regulatory Commission. Multiple Intervenors, in support of its petition for leave to intervene, respectfully shows and alleges:

1. Multiple Intervenors is an unincorporated association of industrial consumers of energy with plants located throughout New York State. A number of members of Multiple Intervenors have plants which purchase energy from license

applicants Niagara Mohawk Power Corporation, New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation. In the calendar year 1982, such purchases of electric energy were in excess of \$100 million.

- 2. Alcan Aluminum Corporation is a member of Multiple
  Intervenors, operates a production facility in Oswego, New York,
  and purchases a substantial amount of electric energy from
  Niagara Mohawk Power Corporation.
- Alcan Aluminum Corporation specifically supports the Multiple Intervenors petition for leave to intervene in this docket.
- 4. Multiple Intervenors is concerned with the maintenance of a secure supply of reasonably priced electric energy for its members' facilities located on the applicants' service territories.
- 5. The licensing or the refusal to license the operation of the Nine Mile Point Nuclear Station, Unit 2 will affect the reliable supply and the price of energy available to Multiple Intervenors' member companies.
- 6. Because the licensing of the Nine Mile Point Nuclear Station, Unit 2 will directly affect the reliable supply and price of energy to Multiple Intervenors' members' facilities, the petitioner has a direct interest in these proceedings.
- 7. The specific aspects of the subject matter of this proceeding as to which the petitioner wishes to intervene are the safety evaluation of the application; the compliance of

the facility with environmental standards; and the compliance of the facility with requirements of the Atomic Energy Act of 1954.

- 8. The petitioner believes that its participation in any hearings scheduled by the Commission in this docket will not be duplicative and will not unduly delay this proceeding.
- 9. The name and address of the person on whom service should be made to Multiple Intervenors is:

Algird F. White, Jr., Esq. DeGraff, Foy, Conway, Holt-Harris & Mealey 90 State Street Albany, NY

WHEREFORE, it is requested that Multiple Intervenors be granted intervenor status in this docket.

Respectfully submitted,

Algird F. White, Jr., Esq.
DeGraff, Foy, Conway, Holt-Harris & Mealey
Attorneys for Multiple Intervenors

Office and P. O. Address

90 State Street Albany, NY 12207

June 10, 1983

DOCKETED

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NUCLEAR REGULATORY COMMISSION UNITED STATES OF AMERICA

Application for a facility operating license from the Niagara Mohawk Power Corporation, acting for itself and as agent for Rochester Gas and Electric Corporation, Central Hudson Gas & Electric Corporation, New York State Electric & Gas Corporation and Long Island Lighting Company for a facility operating license with respect to Nine Mile Point Nuclear Station, Unit 2

JUN 14 A11:13

Docket No. 50-410

## AFFIDAVIT OF SERVICE BY MAIL

KATHLEEN A. RYAN, being duly sworn, deposes and says:

That deponent is not a party to this action, is over 18 years of age and resides in Albany, New York. That on the 10th day of June, 1983, deponent served the within Petition for Leave to Intervene of Multiple Intervenors upon Conner & Wetterhahn, P.C., attorneys for Applicant, at Suite 1050, 1747 Pennsylvania Avenue, N.W., Washington, D.C. 20006, the address designated by said attorneys for that purpose, by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper in an official depository under the exclusive care and custody of the United States postal service within the state of New York.

Kathleen A. Ryan

Sworn to before me this 10th day of June, 1983.

Notary Public