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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Appeal Board

'35 FEB 28 A10:49

In the Matter of )  
)  
LOUISIANA POWER & LIGHT COMPANY) )  
)  
(Waterford Steam Electric )  
Station, Unit 3) )  
)

Docket No. 50-382 OL  
OFFICE OF SECRETARY  
DOCKETING SERVICE  
BRANCH

JOINT INTERVENORS' MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION TO REOPEN

Joint Intervenors request leave to file the following Supplemental Memorandum in Support of their Motion to Reopen.

The request is based on recent public reports concerning the instability and lack of independence of the management of applicant Louisiana Power and Light Company ("LP&L"); mismanagement or deliberately wrongful management conduct demonstrated by a recent blackout of the City of New Orleans; misleading statements Middle South has made in its most recent offering statement; and statements of top LP&L management showing a general lack of respect for Nuclear Regulatory Commission ("NRC") regulation.

These reports provide compelling support for Joint Intervenors' proposed contention that LP&L lacks the requisite character and competence to operate Waterford 3 safely.

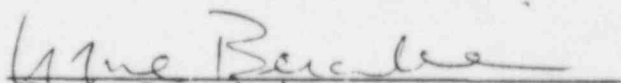
As can be seen from the exhibits supporting their Supplemental Memorandum, Joint Intervenors have learned of this new information only within the last few weeks.

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For the foregoing reasons and for good cause shown, Joint Intervenors request that this Atomic Safety Licensing and Appeal Board ("Appeal Board") grant leave for the filing of this Supplemental Memorandum in Support of Joint Intervenors' Motion to Reopen.

Respectfully submitted,



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Dated: February 25, 1985