

BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS  
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

URANIUM FUEL LICENSING BRANCH

APPLICATION of Westinghouse )  
Electric Corporation for a )  
Special Nuclear Material )  
License for the Alabama )  
Nuclear Fuel Fabrication )  
Plant to be located near )  
Prattville, Ala. )

DOCKET NO. 70-2909



PETITION FOR LEAVE TO INTERVENE  
AND REQUEST FOR A HEARING

The Petitioner, JOHN A. JOHNSON, hereby  
moves for leave to intervene in the above-styled and numbered  
proceeding and states unto this Honorable agency as follows:

1. The Petitioner resides at 50 LAMAR AVENUE, SELMA,  
in DALLAS County, Alabama.

2. The Petitioner works at ALABAMA STATE DEPARTMENT OF EDUCATION  
in MONTGOMERY County, Alabama.

3. Petitioner is a person whose interest may be affected  
by the construction and operation of the proposed nuclear fuel  
fabrication plant in that:

A. Petitioner lives and works in close proximity to  
the proposed facility.

B. Petitioner would be affected by any release of  
radiation into the environment.

C. Petitioner would be affected by any accident in-  
volving transportation of uranium to the facility or of fuel  
pellets from the facility.

D. Petitioner would be affected by releases of rad-  
iation from waste storage containers which are to be located at  
the proposed facility.

E. Petitioner would be affected by any accident which  
occurred as a result of sabotage, geological upheavals, flooding,  
tornadoes, or for any other causes.

F. Petitioner's enjoyment of his property may be  
affected by the proposal.

4. Petitioner should be permitted to intervene in this  
cause because the interests of Petitioner may be affected by  
the results of the proceeding in all the aspects listed in  
paragraph #3. Any order which may be entered in the proceedings  
may affect Petitioner's safety, health and enjoyment of property.

5. Pursuant to S 2.714(a)(3)(b), Petitioner will file a  
supplement which specifics with particularity the contentions with  
regard to each aspect on which intervention is requested. Such

pre-hearing conference.

6. Pursuant to §2.714, Petitioner further requests that a hearing be conducted as to all issues raised herein.

April 3, 1980  
DATE

JOHN A. JOHNSON  
PETITIONER

Julian McPhillips  
Julian McPhillips, Attorney  
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Montgomery, Ala. 36101  
(205)-232-1911  
For the Petitioner

50 LAMAR AVENUE  
ADDRESS

SELMA AL 36701  
CITY, STATE, ZIP

832-3481 (OFFICE) 875-7770 (HOME)  
TELEPHONE

VERIFICATION

I, the above-named petitioner, believe the foregoing statements to be true and correct in every particular.

APRIL 3, 1980  
Date

John A. Johnson  
Petitioner

STATE OF ALABAMA  
COUNTY OF MONTGOMERY

Before me, the undersigned Notary Public, appeared John A. Johnson, known to me, who did sign the above verification as <sup>and affidavit</sup> testament that his statements in the foregoing petition are true and correct in every particular, on this the 3rd day of April, 1980.

Julian McPhillips

CERTIFICATE OF SERVICE

I hereby certify that I have this date served copies of the foregoing on the Executive Legal Director, U.S. Nuclear Regulatory Commission, W.T. Crow, U.S. Nuclear Regulatory Commission, Division of Fuel Cycle and Material Safety, and on Thomas M. Lamberty, Esq. Attorney for the applicant. I have filed the original with the secretary of the Commission, U.S. NRC.

April 3, 1980  
Date

Julian McPhillips  
Julian McPhillips