

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

December 5, 2003 (8:44AM)

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

:
:
In matter of : DOCKET NO. 30-36239-ML
CFC LOGISTICS, INC. : ASLBP NO. 03-814-01-ML
materials license application :
:
:

PETITION FOR LEAVE TO INTERVENE

Additional neighbors to the CFC Logistics facility,
(identified in 2a-e herein below) hereby request leave to
intervene in the above-captioned matter, and aver in support
thereof the following:

1. This request for leave is in response to the Notice
of Hearing and of Opportunity to Petition for Leave to Intervene
posted November 5, 2003 in the Federal Register (68 FR 63638).

2. Proposed intervenors are neighbors of the CFC
Logistics, Inc. facility in Quakertown Pennsylvania, a list of
whom appears below, who will be affected by the operation.

a. Kristin Bash lives at 2219 Milford Square Pike,
Milford Square which is located two houses away from the Milford
Square firehouse.

b. George and Sandy Horne live at 2200 Weiss Road,
Quakertown, PA 18951. This residence is located approximately
1200 feet from CFC, Logistics facility.

c. Roseanne and Michael Kelsall reside at 2083 Huber

Drive, Quakertown, PA 18951.

d. Jennifer Bobrownicki of 1869 Strong Road, Quakertown, PA 18951, resides in the same neighborhood as and her backyard adjoins the property of Tom and Kelly Helt, current intervenors.

e. George and Theresa Kielar reside at 2061 Spinnerstown Road, Quakertown, PA 18951. Their property is located between the Spinnerstown Crossing and Valley View developments.

3. Additionally, it is not clear why, whether inadvertently or other, Ken Redles of 7875 Wentz Road, Quakertown was removed from the intervenors list. (In some documents Mr. Redles was mistakenly referred to as "Reynolds").

4. As required by 10 CFR § 2.1205(e), as neighbors to the facility, these proposed intervenors have a direct interest in the outcome in these proceedings. Their health will be placed at risk, their property values will suffer, and they will thus be deprived of their rights to property and health, if the facility is permitted to continue operation.

5. Proposed intervenors assert the same areas of concern as averred previously by the intervenors. They submit that the areas of concern confer standing and are germane to these proceedings.

6. Proposed intervenors' petition is timely in that is being filed within thirty days of the publication of the notice in the Federal Register in accordance with 10 CFR § 2.1205.

7. Also, a few of the proposed intervenors request to attend the site visit scheduled for Thursday, December 11. These proposed intervenors include: Kristin Bash, George and Sandy Horne, Rosanne Kelsall, and Jennifer Bobrownicki.

WHEREFORE, proposed intervenors pray that the Court permit their intervention herein.



ROBERT J. SUGARMAN
Counsel for Intervenors/Proposed
Intervenors

OF COUNSEL:

SUGARMAN & ASSOCIATES, PC
11th Floor, Robert Morris Building
100 N. 17th Street
Philadelphia, PA 19103
215-864-2500

Dated: December 4, 2003

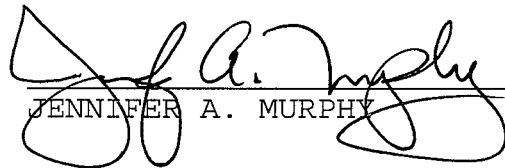
CERTIFICATE OF SERVICE

I, Jennifer A. Murphy, hereby certify that I have served a copy of Petition for Leave to Intervene by first-class mail, email, and facsimile on the following persons on this date:

Anthony J. Thompson, Esquire
Law Offices of Anthony J. Thompson, PC
1225 19th Street, NW
Suite 200
Washington, DC 20036
FAX 202-496-0783

Stephen H. Lewis, Esquire
Office of General Counsel
Mail Stop O - 15 D21
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
FAX 301-415-3725

U.S. Nuclear Regulatory Commission
Office of the Secretary
Attn: Rulemaking and Adjudications Staff
One White Flint North
11555 Rockville Pike
Rockville, MD 20852
FAX 301-415-1101


JENNIFER A. MURPHY

DATED: December 4, 2003

SUGARMAN & ASSOCIATES, PC

ATTORNEYS AT LAW
ROBERT MORRIS BUILDING - 11TH FLOOR
100 NORTH 17TH STREET
PHILADELPHIA, PENNSYLVANIA 19103

ROBERT J. SUGARMAN *
JENNIFER A. MURPHY**
DEBBIE L. GOLDBERG
HEATHER R. BRINTON

215-864-2500 • FAX: 215-864-2501
EMAIL: RJSUGARMAN@AOL.COM

BUCKS COUNTY OFFICE
122 NORTH MAIN STREET
DOYLESTOWN, PA 18901

215-348-8786 • FAX: 215-230-1922

* Also admitted in NY, DC
**Also admitted in NJ

December 4, 2003

VIA ELECTRONIC MAIL, FACSIMILE AND U.S. FIRST CLASS MAIL

U.S. Nuclear Regulatory Commission
Office of the Secretary
Attn: Rulemaking and Adjudications Staff
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

RE: CFC Logistics, Inc.
Docket No. 30-36239-ML
ASLBP No. 03-814-01-ML

Dear Secretary:

Enclosed for filing is Proposed Intervenor's Petition for Leave to Intervene. Copies of the enclosed have been served on the parties indicated on the enclosed certificate of service. Additionally, please return a file-stamped copy in the self-addressed stamped envelope attached herewith.

Respectfully,



Robert J. Sugarman

RJS:saj
Enclosure