

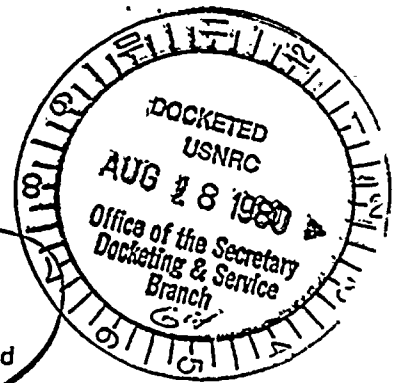
August 11, 1980

To: The United States Nuclear
Regulatory Commission

In the matter of;

Application of Arizona
Public Service Co., et al
For an Operating License
For Palo Verde Nuclear
Generating Station,
Units 1, 2 and 3

Docket nos.:
STN 50-528
STN 50-529 and
STN 50-530



Petition For Leave To Intervene by Patricia Lee
Hourihan, Kevin Dahl and Christopher Shuey

Patricia Lee Hourihan, Kevin Dahl and Christopher Shuey
hereby petition the Nuclear Regulatory Commission (NRC)
for leave to intervene in the above-captioned matter
pursuant to Section 2.714 of the NRC's Rules of Practice.

Identification of Petitioners

(affidavit's attached)

Interests to be affected

Patricia Lee Hourihan, Kevin Dahl and Christopher Shuey
are consumers and ratepayers who own property, both per-
sonal and real, which will be affected by the operation
of the Palo Verde Nuclear Generating Station either as
to routine operation or via an accident involving said
plant. Furthermore, the general safety and health are
interests which will be affected by the routine operation
or an accident concerning said plant. Patricia Lee Hourihan,
Kevin Dahl and Christopher Shuey alleges that the results
of the proceeding will affect the petitioners health,
livelihood and property in that the issuance of the oper-
ating license will adversely affect the petitioners in
the following particulars:

1. The routine operation of the plant will
endanger the health, lives, civil rights, business inter-
ests and property of petitioners.
2. The operation of the plant may result in an
accident which will endanger the interests of petitioners.

No other person or organization has, to this petitioners'
knowledge, filed a motion to intervene which would repre-
sent these interests. Intervener participation is neces-
sary to assure broad and meaningful public participa-
tion and to ensure that full investigation is made into
the application for this operating license.

Patricia Lee Hourihan, Kevin Dahl and Christopher Shuey
submit that we should be allowed to intervene herein

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because an order allowing the applicant to possess, use and operate the Palo Verde Nuclear Generating Station will adversely affect the property, health and lives of not only Patricia Lee Hourihan, Kevin Dahl and Christopher Shuey but the general public of Phoenix and the Valley.

Additionally, if the Commission rules that a hearing shall be had on this Motion to Intervene, Hourihan, Dahl and Shuey maintains that the hearing, in addition to the Pre-hearing conference, should be held in the Phoenix area.

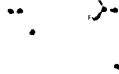
Wherefore, in consideration of the above facts, the petitioners move for an order by the NRC that this motion to intervene be granted in all particulars.

Respectfully submitted,

Patricia Lee Hourihan

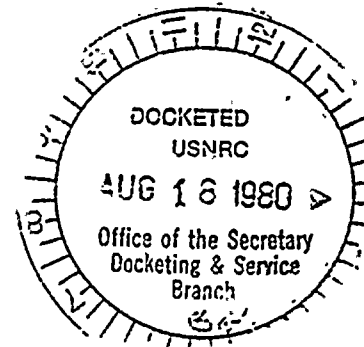
Patricia Lee Hourihan, on
behalf of Kevin Dahl and
Christopher Shuey.

3530 E. Harvard st.
Phoenix, Az. 85008



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Patricia Lee Hourihan

