

Patricia Lee Hourihan  
3530 E. Harvard St.  
Phoenix, Az. 85008  
(602)957-3592

August 11, 1980

Chief Hearing Council  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir;

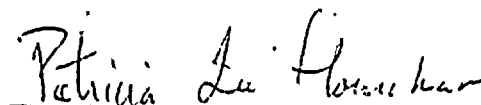
Subject; Docket nos. STN 50-528  
STN 50-529 and STN 50-530  
Application of Arizona Public  
Service Co. et al of an oper-  
ating license for Palo Verde Nuclear  
Generating station. Units 1, 2 and 3

Patricia Lee Hourihan, Kevin Dahl and Christopher Shuey have today filed it's Petition for Leave to Intervene and Motion for a Hearing in the above proceedings, setting forth it's interests in the proceedings and how that interest may be affected by the results of the proceedings.

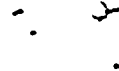
It is our understanding from Patricia Lee Hourihan, s conversation with NRC attorney Steve Schinke, who will be participating in the proceedings, that it is not required at this time that we set forth our contentions. It is our further understanding that the term "to be filed by August 11, 1980" means that the filing must be postmarked by August 11, 1980. Can you please give us some estimated time frame for when the pre-hearing will take place? Specifically, since we must file our supplement to the petition to intervene setting forth our contentions not later than fifteen days prior to the first pre-hearing conference, we are concerned as to how and when we will be notified of such pre-hearing conference. Considering the U.S. mail is not exactly swift, we would appreciate sufficient advance notice to enable us to prepare and file our supplement in a timely manner. Also, from this date forward the petitioners request that all correspondence between the Applicant and the NRC keep an open line with the petitioners. Any letters, memos, telegrams, documents or communication should please be copied and sent to the petitioners.

Thank-you,

Respectfully,

  
Patricia Lee Hourihan

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Affidavit of Patricia Lee Hourihan

I, Patricia Lee Hourihan, being duly sworn on oath, state the following:

1. That I am a resident of Phoenix, Maricopa County, Arizona and that my mailing address is 3530 E. Harvard St. Phoenix, Az. 85008

2. That I am employed by Kerr-Cole Solar Enterprises in Tempe, Az.

3. That I own (with my father) .30 acres of land just NE of Bell rd. and approx. 1/2 mile E and 1/2 mile N of Sun City, Az. golf course #4.

3. That the representations of this petition to intervene and this Motion for a Hearing regarding Kevin Dahl and Christopher Shuey, and the interests to be affected are true and correct to the best of my knowledge.

Patricia Lee Hourihan

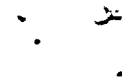
Patricia Lee Hourihan

August 11, 1980

Subscribed and sworn to before me this 11th day of August, 1980.

My commission expires:  
May 22, 1981

[Signature]  
Notary Public



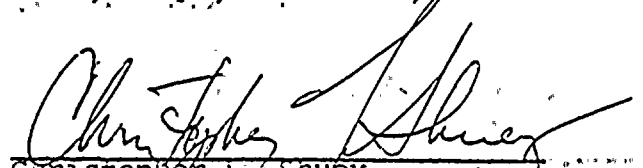
STATEMENT OF STANDING

My name is Christopher L. Shuey. I have been a resident of the Phoenix, Arizona area since June 16, 1974. I currently reside at 1110 W. Second St., Tempe, which has been my home for the past five years.

During my residency in Arizona I have attended Arizona State University on a part-time basis. I worked as a newspaper reporter with the Scottsdale Daily Progress for nearly four years and have been active in volunteer community organizations for the past two years. I currently am employed as a staff researcher for Arizonans for a Better Environment, a non-profit Tempe-based environmental research group, and as a correspondent to the Time, Inc. magazine chain. At various times in the past three years I have been self-employed as a free-lance writer.

I became interested in the nuclear energy issue as a reporter and have carried over that interest into my personal affairs as an activist with various civic organizations opposed to nuclear power. I am concerned that a three-unit nuclear complex is being constructed within 60 miles of my home and within 40 miles of a population of more than one million persons. I am seeking standing as a party to the operating license process for the Palo Verde Nuclear Generating Station first as a concerned citizen of Arizona and second as an individual dedicated to the proposition that an adequately informed public is the backbone of a true democracy and that my involvement in this process can only further the community's awareness of the issue.

I may be reached at 1110 W. Second St., Tempe, AZ 85281, or (602) 968-6623.



Christopher L. Shuey





The foregoing Statement of Standing was sworn to and subscribed to before me by the said Christopher L. Shuey this 8th day of August, 1980.

*Ruth Young*

Ruth Young, Notary Public  
State of Ohio

My commission expires March 6, 1982



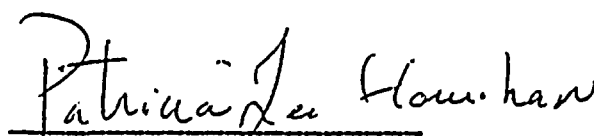


I hereby certify that a copy of this Motion for Leave to Intervene and Request for a Hearing has been sent to the following on this day, Aug. 11, 1980 by first class mail (U.S. Postal Service). With the exception of the copies to Arthur D. Gehr, Esq. which were hand delivered.

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

Executive Legal Director  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Arthur D. Gehr, Esq.,  
Snell and Wilmer  
8100 Valley Center  
Phoenix, Az. 85073

  
Patricia Lee Hourihan

