

BEFORE THE
U.S. NUCLEAR REGULATORY COMMISSION

IN RE: THREE MILE ISLAND



PETITION TO INTERVENE

AND NOW, this 15th day of August, 1979, comes Robert L. Knupp, Assistant Solicitor for the County of Dauphin, and respectfully petitions to intervene in proceedings before the Nuclear Regulatory Commission involving Three Mile Island, for the following reasons:

1. The Dauphin County Commissioners are the elected representatives of all of the citizens of Dauphin County and have a statutory duty to protect the health, welfare and safety of the citizens of Dauphin County.

2. Three Mile Island and the nuclear power station located thereon are physically located within the confines of Dauphin County.

3. The rights and liabilities of the citizens of Dauphin County may be affected by any judgments or decisions made by the Nuclear Regulatory decision and hearing issues concerning Unit No. 1 and Unit No. 2 of the Metropolitan Edison Company located on said Island.

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WHEREFORE, Commissioners of Dauphin County respectfully request that the following relief be granted:

(a) That all notices pertaining to any hearings be sent to Assistant Solicitor Robert L. Knupp, Applicant herein, at his office address located at PO Box "P", 407 North Front Street, Harrisburg, Pennsylvania, 17108.

(b) That copies of notices be sent to John E. Minnich, Chairman, Dauphin County Board of Commissioners, Dauphin County Courthouse, Front and Market Streets, Harrisburg, Pennsylvania, 17101.

(c) That the Dauphin County Commissioners be allowed to appear and be represented by counsel at any hearings scheduled by the Nuclear Regulatory Commission or any panel appointed by the said Commission relative to Three Mile Island, the nuclear electrical generating units thereon, the rights and liabilities of Metropolitan Edison Company, the rights and liabilities of Babcock & Wilcox, Inc., and any other matters pertaining thereto.

Respectfully submitted:


Robert L. Knupp
Assistant Solicitor
County of Dauphin

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