

UNITED STATES OF AMERICA  
BEFORE THE NUCLEAR REGULATORY COMMISSION



POINT BEACH NUCLEAR PLANT UNIT 1  
DOCKET NO. 50-266

PETITION FOR LEAVE TO INTERVENE  
AND  
PETITION FOR HEARING

Petitioner WISCONSIN'S ENVIRONMENTAL DECADE, INC., pursuant to ss. 10 CFR 2.100 through 2.105 and chapters 50 and 51, hereby petitions the Nuclear Regulatory Commission("Commission") for leave to intervene in the above-captioned proceeding in which the licensee Wisconsin Electric Power Company has applied for an amendment to its operating license by filing dated November 2, 1979.

The petitioner is an organization of citizens throughout the State of Wisconsin, including members who reside in the vicinity of the licensee's Point Beach Nuclear Reactor Unit 1, the plant which is the subject of the aforementioned operating license and proposed amendment thereto.

The petitioner seeks to intervene in said proceeding on behalf of itself and its members, particularly those residing in the vicinity of the Point Beach Unit 1 plant on the grounds that (1) they have a legally protected interest in the amendment application proceeding which is likely to be affected by the outcome of the proceeding; (2) the petitioner's interests are not now being adequately represented by the existing parties; and (3) the granting of this petition would not delay or prejudice the interests of the licensee to adjudicate the merits of its amendment application.

The petitioner respectfully requests that all documents previously filed in this regard by the licensee and that all further documents and filings

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pertaining to this matter be served upon its attorney at her office at  
114 East Mifflin Street, Madison, WI, 53703.

Furthermore, the petitioner respectfully requests the Commission to  
hold an adjudicatory hearing to determine the public health and safety impacts  
of the proposed licensee amendment application because of the significant  
hazards posed at the Point Beach Unit 1 plant at this time as a result of  
steam tube degradation.

Dated this 26th day of November, at Madison, Wisconsin.

WISCONSIN'S ENVIRONMENTAL DECADE, INC.

by Kathleen M. Falk  
KATHLEEN M. FALK

General Counsel

114 East Mifflin Street  
Madison, WI 53703  
608-251-7020

I hereby certify that on November 26, 1979, I personally deposited in the  
United States First Class Mails a copy of this document as well as a copy of  
the Response of Petitioner Wisconsin's Environmental Decade, Inc. to November 23,  
1979, Letter of Applicant Wisconsin Electric Power Company (Steam Generator  
Tube Degradation Matter)", dated November 26, 1979, to Mr. Sol Burstein of  
Wisconsin Electric Power Company, 231 W. Michigan, Milwaukee, WI 53202.

Kathleen M. Falk

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