

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Atomic Safety and Licensing Board

In the Matter of)	
)	
KANSAS GAS & ELECTRIC COMPANY AND)	Docket No. STN 50-482-SP
KANSAS CITY POWER & LIGHT COMPANY)	
)	(Construction Permit
(Wolf Creek Generating Station,)	Amendment)
Unit No. 1))	

SUGGESTIONS IN SUPPORT OF PETITION FOR LEAVE TO INTERVENE
AS AN INTERESTED STATE 10 CFR SECTION 2.715(c)

On November 23, 1979, the Atomic Safety and Licensing Board of the Nuclear Regulatory Commission issued an Order directing a further submission by the Missouri Public Service Commission (hereinafter referred to as the MPSC) concerning the MPSC petition to intervene as an interested state under 10 CFR Section 2.715(c) in the above captioned matter. The order directed the MPSC to file one of the following with the Secretary of the Atomic Safety and Licensing Board: 1) a statement indicating its agreement that no further proceedings are in order; 2) a motion to amend its petition to intervene under 10 CFR Section 2.714, together with its proposed amended petition raising at least one specific aspect on which a hearing should be held; 3) a memorandum supporting the position that a hearing should be held on the basis of the petition to intervene under 10 CFR Section 2.715(c) that has already been filed; or 4) any other document which the petitioner feels would resolve the issue of whether further proceedings are in order.

Pursuant to this directive, the MPSC, by and through its General Counsel, states the following:

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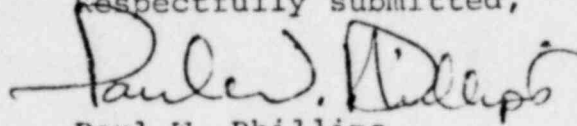
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The MPSC intervened as an interested state in this matter because of its jurisdiction over Kansas City Power & Light Company, presently a one-half owner of the Wolf Creek facility. The documents filed in this matter are presumed to contain information regarding the sale of a portion of the Wolf Creek facility. Since the sale of any assets of a regulated utility in the State of Missouri must be submitted to the MPSC for its approval, the General Counsel intervened on behalf of the MPSC in order to be placed upon the service list and to receive all documents filed in this matter.

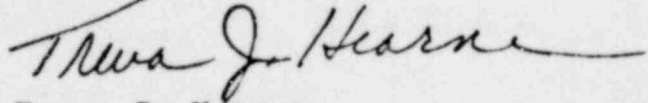
The MPSC filed pursuant to the rules and regulations of the Nuclear Regulatory Commission. See 10 CFR Section 2.715(c). The MPSC filed in the manner most likely to expedite its receipt of the documents filed in this matter. The MPSC has no intention of amending its petition to intervene as a 2.714 party nor to raise any specific aspects upon which a hearing should be held. Moreover, the MPSC makes no statement indicating whether or not further proceedings are required in this matter. A decision regarding further proceedings is wholly within the discretion of the Atomic Safety and Licensing Board and the MPSC defers to its judgment in this matter.

The MPSC would, however, repeat its earlier request pursuant to its original intervention as a 2.715(c) party that the State of Missouri be placed on the service list in order to receive all documentation in this case as a matter of right.

Respectfully submitted,



Paul W. Phillips
General Counsel



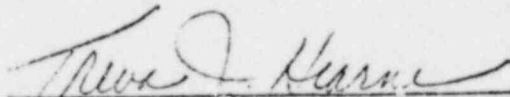
Treva J. Hearne
Assistant General Counsel

Attorneys for Public Service
Commission of the State of Missouri
P. O. Box 360
Jefferson City, Missouri 65102

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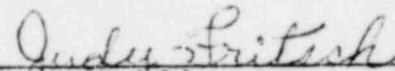
AFFIDAVIT

I hereby swear that I have signed the foregoing document in a representative capacity as attorney for the Missouri Public Service Commission, with full authority in that capacity; that I have read said document and am familiar with its contents; and, that to the best of my knowledge, information and belief the statements made in it are true.

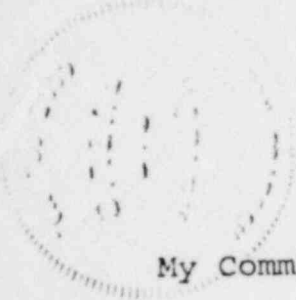


Treva J. Hearne
Assistant General Counsel

Subscribed and sworn before me this 31st day of December, 1979.



Notary Public

My Commission expires

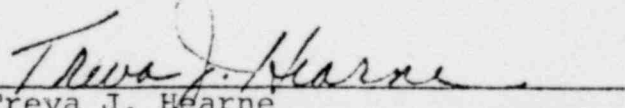
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES JULY 1, 1982

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CERTIFICATE OF SERVICE

I, Treva J. Hearne, certify that a copy of the foregoing Notice of Appearance and Suggestions in Support of Petition for Leave to Intervene as an Interested State 10 CFR Section 2.715(c) was served on the Executive Legal Director, a member of the General Counsel of the Nuclear Regulatory Commission, at the United States Nuclear Regulatory Commission, Washington, D. C. 20555, Samuel J. Chilk, Secretary of the Commission, and on Herbert Grossman, Atomic Safety and Licensing Board Chairman, United States Nuclear Regulatory Commission, Washington, D. C. 20555, and on Gerald Charnoff, Esq., Shaw, Pittman, Potts & Trowbridge, 1800 M Street, N.W., Washington, D. C. 20036, by deposit of such copies in the United States Mail properly stamped and addressed on the 21st day of December, 1979.

Dated December 21st, 1979.


Treva J. Hearne
Assistant General Counsel for the
Missouri Public Service Commission

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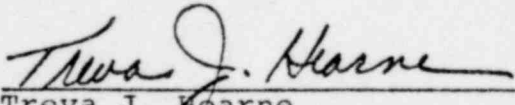
NOTICE OF APPEARANCE

Pursuant to 10 CFR Section 2.713(a), I, Treva J. Hearne of P. O. Box 360, Jefferson City, Missouri, telephone number (314) 751-4273, hereby submit this notice of appearance in a representative capacity in this proceeding.

The basis of my eligibility is admission to the bar of the Supreme Court of the State of Missouri.

I will appear on behalf of the Public Service Commission of P. O. Box 360, Jefferson City, Missouri, Intervenor in the above-entitled proceeding.

Dated December 21, 1979.



Treva J. Hearne
Assistant General Counsel for the
Missouri Public Service Commission

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