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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
New York State Electric)
and Gas Corporation and)
Long Island Lighting Company)
NYSE&G 1 and 2)

! Se. MAR 28 1979
Docket Nos. STN 50-596
and STN 50-597

PETITION TO INTERVENE
OF MID-HUDSON NUCLEAR
OPPONENTS, INC. ("MHNO")



MHNO hereby petitions for leave to intervene in this proceeding as a full party.

1. MHNO is a New York Not-for-Profit corporation and an exempt organization under Section 501(c)(3) of the Internal Revenue Code.

2. MHNO's principal office is in New Paltz, New York and service upon it should be made upon

Mid-Hudson Nuclear Opponents, Inc.
P.O. Box 666
New Paltz, New York 12561

3. MHNO has approximately 2500 contributing members throughout the Hudson Valley principally in the region south of Albany and North of Newburgh.

4. The primary purpose of MHNO is to act as a spokesman for its members on issues involving construction of electric generating stations and transmission lines, conservation of energy, the uses of nuclear power and rates charged for electricity.

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5. MHNO has been an active participant in cases both at the Federal and State level involving energy planning and pricing. It is a full party in case 80008, the New York State siting proceeding relating to the same facilities which are the subject of this proceeding.

6. The design, siting, timing, construction and operation of the facilities for which construction permits in this case are sought will have a significant impact on the following interests of MHNO and its members:

- (a) The health and safety of the citizens in the mid-Hudson region;
- (b) The price of electricity available;
- (c) The ecology of the Hudson Valley and River, including its aesthetic and historic resources;
- (d) The course of energy planning in New York State.

7. MHNO wishes to participate in the following aspects of this proceeding which affect it.

- (a) Alternate site considerations since Hudson Valley sites are the prime alternatives;
- (b) The need for these facilities and whether they would be consistent with a long range energy plan for New York State.

- (c) Ancillary facilities which may be required in the Hudson Valley if the construction permit is granted for the New Haven site.
- (d) The Financial and technical ability of the applicants to construct the proposed facilities in a manner which would not injure MHNO and its members.
- (e) The capital and operating costs of the proposed facilities and the impact of these on rates charged to electric consumers in the mid-Hudson area.

8. Since MHNO represents a distinct mid-Hudson area constituency with interests different than any of the parties to this case, its intervention is necessary to insure that these interests are represented in this proceeding.

9. In addition, through its years of participation in energy matters, MHNO has developed a unique expertise on certain aspects of energy planning in New York State which will aid the development of a full record in this case.

10. Therefore, MHNO should be permitted to intervene in this case as a full party.

March 19, 1979

Peter D. G. Brown
Chairman of the Board
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