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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION



In the matter of

New York State Electric and Gas Co.
and Long Island Lighting Co.
Docket No. 1 and 2

Docket No. STN 50-500
and 597

PETITION TO INTERVENE

Petitioner, Safe Energy for New Haven, individually and in behalf of the members of Safe Energy for New Haven and of the public hereby petition to intervene in this proceeding pursuant to Section 139 of the Atomic Energy Act of 1954, as amended, Sections 506 of the Administrative Procedure Act, as amended, and Section 2.714 of the Nuclear Regulatory Commission Rules of Practice.

1. Safe Energy for New Haven is an unincorporated association of private citizens residing in the area of New Haven, New York, formed to conserve and to protect the natural resources and physical environment of the region, including Lake Ontario.

2. Since its formation in April, 1977, Safe Energy for New Haven has actively sought to promote and represent the public interest in protecting the Central New York environment from unwarranted and unlawful exploitation and degradation by public utilities (including the Applicant) intent upon using the region for the generation and transmission of vast amounts of electricity for consumption elsewhere in New York State and the United States. In this regard, Safe Energy for New Haven's purposes would be thwarted by the construction of new generating or transmission capacity in the region in violation of existing law.

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3. In pursuance of its objectives, Safe Energy has conducted an educational campaign to apprise the people of the region of the environmental effects of the large-scale generation of power and of the health and safety hazards incident thereto. Safe Energy for New Haven's intervention is to help develop a complete evidentiary record, in the public interest, sufficient to enable the appropriate commissions to evaluate the need for such facilities, and the environmental impact of their construction.

4. The members of Safe Energy for New Haven are residents variously, of the Towns of New Haven, Richland, Meriden, Groton, Parish, Palermo and the City of Tilton. Each of these persons reside and most own real property, within the zone that would be affected by a major accident at the Applicant's plant, and would be seriously if not fatally, injured by such an accident. Members would also be subject to injury from lesser releases of radioactivity from the facility. Furthermore, many of Safe Energy's members use the Lake and its beaches for a variety of recreational and aesthetic purposes, including swimming, boating, fishing, and birding.

5. All of the aforementioned interests of petitioners may be affected by this proceeding. The petitioner's interests in health and safety will be adversely affected by radiological hazards incident to normal plant operation, associated activities such as the storage and transport of highly toxic wastes, and by the possibility of accident in connection with plant operations or such associated activities, unless all issues of design safety, quality assurance, and emergency plans are fully explored and soundly resolved.

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In addition, the petitioners aforesaid interests as well as their interests in the quality of Lake Ontario will be adversely affected unless the environmental impact, and alternative to, the proposed plant is thoroughly considered, the benefit-cost analysis of the proposed plant is fairly made and the permit applied for herein, if issued, is appropriately conditioned to protect environmental values.

6. Petitioners should be permitted to intervene since they have statutory right to intervene under the Atomic Energy Act of 1954, as amended, and under the administrative procedure act, as amended, since their health and safety (as well as health and safety of the public whose interests they seek to represent) may be adversely affected by the results of this proceeding and since their interests in environmental values (as well as the public's interest in environmental values which petitioners seek to represent) may also be adversely affected.

Therefore petitioners respectfully request that the within petition to intervene be granted, in all respects.

March 10, 1979

Linda Clark
Linda Clark, Chairperson
Safe Energy for New Haven

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