

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:)

COMMONWEALTH EDISON COMPANY)

INTERSTATE POWER COMPANY,)

IOWA-ILLINOIS GAS & ELECTRIC)

COMPANY, Carroll County Site.)

DOCKET NOS. S50-599

S50-600

COMMENTS IN OPPOSITION TO EARLY SITE REVIEW

The People of the State of Illinois (hereinafter the "People") by William J. Scott, Attorney General of the State of Illinois, have an interest in this proceeding which is set forth in their Petition for Leave to Intervene. The People contend that an early site review with regard to the proposed Carroll County nuclear generating stations, would be untimely. The bases for their contention are as follows:

1. Commonwealth Edison Company's annual growth of energy demand has slowed, making further immediate construction of generating units unnecessary at this point. The necessity for Commonwealth's current and future construction is currently being investigated in hearings before the Illinois Commerce Commission (#78-0646).

2. On June 1, 1979 Commonwealth announced a two year delay in their Carroll County project plans.

3. Site suitability should not be determined until all that may be learned from the Three Mile Island incident may be incorporated into the decision.

The People will submit a brief in support of these contentions in the near future.

360 223

7907130 505 G

PEOPLE OF THE STATE OF ILLINOIS

WILLIAM J. SCOTT
Attorney General
State of Illinois

BY:

Nancy J. Bennett

NANCY J. BENNETT
Assistant Attorney General
Environmental Control Division

STATE OF ILLINOIS)
COUNTY OF COOK)SS.
)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

A F F I D A V I T

I, NANCY J. BENNETT, an attorney, hereby certify the following in support of the foregoing Petition to Intervene:

1. That I am an Assistant Attorney General with the Environmental Control Division of the Office of the Attorney General of Illinois;

2. That I am of counsel for the State of Illinois in the matter of Commonwealth Edison Company, Interstate Power Company, Iowa-Illinois Gas & Electric Company, Carrol County Site;

3. That all facts alleged in these Comments in Opposition attached hereto are true to the best of my knowledge and belief.



NANCY J. BENNETT

SUBSCRIBED AND SWORN TO
before me this 4th day
of June, 1979.



NOTARY PUBLIC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:)

COMMONWEALTH EDISON COMPANY)
INTERSTATE POWER COMPANY,)
IOWA-ILLINOIS GAS & ELECTRIC)
COMPANY, Carroll County Site.)

DOCKET NOS. S50-599
S50-600

CERTIFICATE OF SERVICE

NANCY J. BENNETT, hereby certify that I have this 4th day of June, 1979 served copies of the foregoing Comments In Opposition To Early Site Review for Leave to Intervene on each of the following persons by causing same to be deposited in envelopes addressed to said persons, first class, postage prepaid, and deposited with the United States Postal Service at 160 North LaSalle Street, Chicago, Illinois 60601.

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Chief, Docketing and Service Section

Executive Legal Director
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Richard E. Powell, Esquire
Isham, Lincoln & Beale
One First National Plaza
Chicago, Illinois 60603

Nancy J. Bennett

NANCY J. BENNETT
Assistant Attorney General
Environmental Control Division

188 W. Randolph, Suite 2315
Chicago, Illinois 60601
(312) 793-2491

360 226