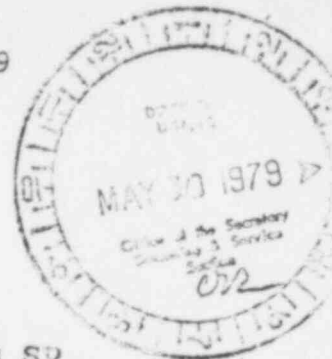


5/25/79

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
VIRGINIA ELECTRIC AND POWER COMPANY) Docket Nos. 50-338 SP
(North Anna Power Station,) 50-339 SP
Units 1 and 2) (Proposed Amendment to
Operating License NPF-4)

NRC PUBLIC DOCUMENT ROOM
MOTION FOR CONSOLIDATION

Pursuant to 10 CFR 2.715a, Citizens Energy Forum, Inc. (CEF) requests the Atomic Safety and Licensing Board (Board) to order intervenor CEF to be consolidated with intervenor Potomac Alliance (Alliance) for the purpose of participating in the remainder of this proceeding. Such consolidation would apply to the presentation of evidence, cross-examination, briefs, proposed findings of fact and conclusions of law and argument, and any appeals.

CEF makes this motion primarily to avoid unduly delaying this proceeding. Several recent developments have put an extra burden on some of CEF's key members involved directly in this proceeding. These include the serious illness in the family of one member and a job transfer out of the immediate area of another. In addition, CEF, which is not represented by counsel, finds that responding to the many motions and discovery requests filed by Vepco and the NRC Staff have added a burden to the already substantial responsibilities of its members involved in this proceeding.

344 209

790718 0638

The result of these constraints is that CEF is unsure whether it will be able to comply with all its responsibilities under NRC regulations within the required time limits, especially in light of the rushed hearing schedule that has been set by the Board. Instead of inconveniencing the other parties and possibly running afoul of the Board by stretching some deadlines, CEF has decided to ask to be consolidated with the Alliance, and to be represented by its spokesperson.

If this motion is granted, CEF still intends to give its full support to the Alliance, particularly concerning the contentions which have been raised by CEF, and may request the Secretary of the NRC for leave to make an appearance at the prehearing conference.

Counsel for the Alliance and the NRC Staff have told CEF by telephone this date that they support the granting of this motion.

Respectfully submitted,

Irwin B. Kroot/ks
Irwin Kroot, for CEF

Dated this 25th day of May,
1979, in Washington, D.C.

344 210

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Motion for Consolidation has been mailed this 25th day of May, 1979, by deposit in the U.S. Mail, first class, to the following:

Secretary,
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Chief, Docketing and Service Section

James Dougherty, Esq.
PO Box 9306
Washington, D.C. 20005

Michael Maupin, Esq.
Hunton & Williams
PO Box 1538
Richmond, Va. 23212

Steven C. Goldberg, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

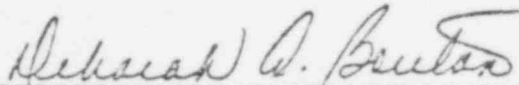
Dr. Quentin J. Stober
Fisheries Research Institute
University of Washington
Seattle, Wash. 98195

Valentine B. Deale, Esq., Chairman
Atomic Safety and Licensing Board
1001 Connecticut Ave. NW
Washington, D.C. 20036

Atomic Safety & Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Ernest Hill
Lawrence Livermore Laboratory
University of California
PO Box 800, L-123
Livermore, Calif. 94550

Atomic Safety & Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Deborah A. Bouton
Secretary, CEF

344 211