

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the matter of
WESTINGHOUSE ELECTRIC CORP.
(Exports to the Philippines)

DOCKET NUMBER

11000495

Application No. XR-120
Docket No. 50-574

Application No. XCOM 0013
Application No. XSNMO 1471

MOTION TO AMEND PETITION FOR LEAVE TO INTERVENE
AND REQUEST FOR HEARING

The Movement for a Free Philippines ("MFP") respectfully requests that this Commission allow amendment of the Petition for Leave to Intervene and Request for Hearing filed in the above-captioned matters on April 19, 1979 to allow MFP to join in that Petition.

I. IDENTIFICATION OF PETITIONER^{1/}

MFP is an unincorporated association of Filipino political refugees with 39 chapters in the United States and a membership comprised of both American citizens and Filipinos currently residing in the United States.^{2/}

MFP has thousands of members in the Philippines who, due to the political climate, must remain secret. Many reside and/or own property within 40 mi. of the site of the proposed reactor. In addition, many of the MFP members in the United States own real property located within the same radial distance from the reactor.

^{1/} This information is submitted pursuant to 10 C.F.R. §110.82(b)(1) and (4).

^{2/} The attached affidavit of Heherson Alvarez more fully details MFP and its members and activities.

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The International Secretary General of MFP, Heherson Alvarez, is empowered to authorized participation in this matter in MFP's name. Mr. Alvarez, after polling of the members of the organization at their annual convention, has done so.

The International President of MFP is Raoul S. Manglapus. He has served as Undersecretary of Foreign Affairs and Secretary of Foreign Affairs in the Philippine government and was additionally a member of the Filipino Senate.

MFP's offices are Suite 804, National Press Building, Washington, D.C. 20045, and its telephone number is 630-0400.

II. INTEREST OF MFP

MFP's interests in this matter are wide and varied. It seeks to prevent the radioactive contamination of the homes and farms of many of its members. Additionally, it is seriously concerned about the threat to the security of the Philippines, which is inexorably intertwined with that of the United States, posed by this reactor.

MFP seeks to bring to the attention of Filipino citizens and their government the attendant risks and hazards of this project but because of the political conditions there and the exile status of its public members it has been unable to do so. Participation by MFP at the NRC is the only avenue by which MFP can share its information and concerns about this project.


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As shown in the attached Sixth Annual Convention Program, MFP has devoted large amounts of time, effort and resources to studying and discussing this project. In evaluating this project as well as trying to understand the impact of U.S. foreign aid and international export programs upon the Philippines, MFP has placed great reliance and worked closely with the Center for Development Policy ("CDP"), a proposed intervenor in this matter. CDP has supplied MFP with the technical and scientific knowledge necessary to understand the effect of this reactor upon MFP's members.

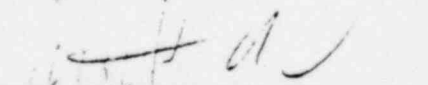
III. RELIEF REQUESTED

MFP respectfully requests that the Commission allow it to join with the Center for Development Policy as an intervenor in the above-captioned matters and allow MFP to participate in any and all hearings to be held on this reactor.

Respectfully submitted,



Thomas R. Asher



Matthew B. Bogin

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CERTIFICATE OF SERVICE

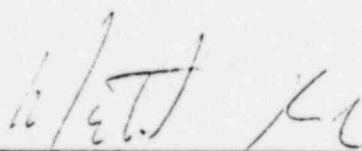
I hereby certify that copies of "Motion to Amend Petition for Leave to Intervene and Request for Hearing" were mailed, first-class postage prepaid, to the following individuals this 24 day of October, 1979:

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Supplemental Memorandum" and accompanying Affidavit were mailed, first-class postage prepaid, to the following individuals this 3 day of October, 1979:

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