

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In The Matter of :

THE CINCINNATI GAS & ELECTRIC
COMPANY, et al. :

Docket No. 50-358

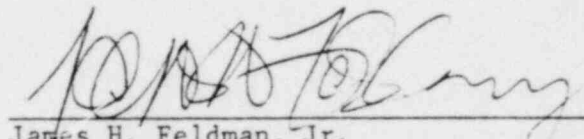
(WM. H. ZIMMER NUCLEAR POWER
STATION) :

MIAMI VALLEY'S MEMORANDUM IN OPPOSITION TO
APPLICANT'S MOTION TO BEGIN HEARINGS ON EMERGENCY PLANNING
AND MONITORING AND FOR OTHER SUPPORTIVE RELIEF

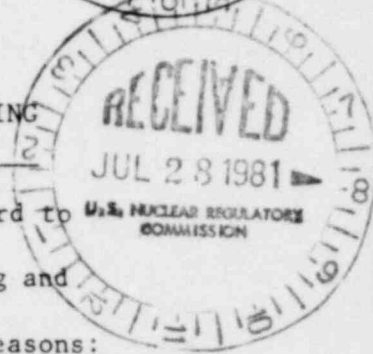
Intervenor Miami Valley Power Project (MVPP) urges the board to deny Applicant's Motion to Begin Hearings on Emergency Planning and Monitoring and for other Supportive Relief for the following reasons:

1. The issue of Emergency Plans is not ripe for hearing since the emergency plans of state and local jurisdictions are not complete.
2. MVPP would object to the consolidation of the remaining contentions if it would mean that Miami Valley would lose its right to cross examine witnesses. 10 CFR Section 2.715a specifically provides that the Board may not order a consolidation that would prejudice the rights of any party. MVPP's rights would clearly be prejudiced if it were denied the right of cross examination as an individual party. The interests of MVPP are not represented by any other party.

Respectfully submitted,



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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Charles Bechhoefer, Chairman
Dr. Frank F. Hooper, Member
Dr. M. Stanley Livingston



In the Matter of

CINCINNATI GAS AND ELECTRIC
COMPANY, ET AL,
(William H. Zimmer Nuclear
Power Station)

:
:
:
: DOCKET NO. 50-358
: APPLICATION FOR
: OPERATING LICENSE.

CERTIFICATE OF SERVICE

I hereby certify that copies of MVPP's Memorandum in
Opposition to Applicants' Motion to Begin ~~Hearings on Emergency~~
Planning and Monitoring and for Other Supportive Relief.

_____ in the above-captioned proceed-
ing have been served on the following persons by posting the same
in the U.S. Mails, postage prepaid, this 23 day of July
1981.

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Administrative Judge M. Stanley Livingston
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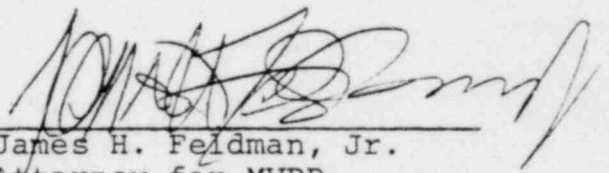
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