

DOCKET NUMBER 50-395
PROD. & UTIL. FAC.IN THE UNITED STATES COURT
OF APPEALS FOR THE FOURTH CIRCUIT

Central Electric Power Cooperative, Inc.,)

Petitioner,)

v.)

United States Nuclear Regulatory)
Commission,)

Respondent)

Docket No.
81-1785MOTION OF THE SOUTH CAROLINA PUBLIC SERVICE
AUTHORITY TO INTERVENE PURSUANT TO 28 U.S.C. §2348

The South Carolina Public Service Authority ("the Authority"), an agency of the State of South Carolina, respectfully moves pursuant to 28 U.S.C. §2348 to intervene in the above-captioned matter as a matter of right and states that its interests in and the grounds for intervention are as follows:

1. Pursuant to its Petition for Review filed August 21, 1981, Central Electric Power Cooperative ("Central") seeks review of an order of the Nuclear Regulatory Commission ("NRC") denying Central's petition for a finding of "significant changes" under 42 U.S.C. §2135(c)(2); a finding of "significant changes" would have triggered an antitrust review with respect to the pending operating license for the Virgil C. Summer Nuclear Station, Unit 1, owned jointly by the Authority and South Carolina Electric and Gas Company.*

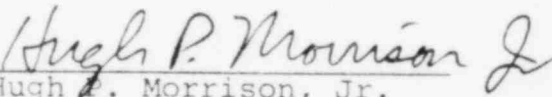
* By filing this motion, the Authority does not necessarily recognize there has been final agency action for purposes of an appeal. Central's motions for reconsideration dated July 6, 1981 and July 20, 1981 are still pending before the NRC.

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2. As a co-applicant for an operating license for the Summer Nuclear Station, the Authority participated as a party in the NRC proceedings that are the subject of this appeal and has interests which will be materially affected by the outcome of this appeal and which can not be adequately represented by any other party.

The South Carolina Public Service Authority hereby requests that all papers filed in this proceeding be served on its counsel at the address indicated below.

Respectfully submitted,


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Dated: September , 1981
Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing
MOTION TO INTERVENE were mailed this first day of September,
1981, by first-class mail, postage prepaid, to the following:

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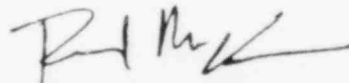
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Dated: September 1, 1981
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