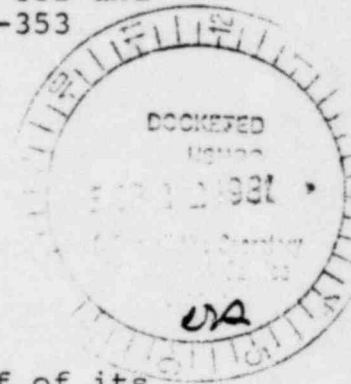


NUCLEAR REGULATORY COMMISSION

In the Matter of
Operating License Application of
Philadelphia Electric Company
Limerick Generating Station
Units 1 and 2

: Docket Nos. 50-352 and
: 50-353
:
:
:



PETITION FOR INTERVENTION

The KEYSTONE ALLIANCE, on its own behalf and on behalf of its members, hereby petitions the Nuclear Regulatory Commission for leave to intervene in the above captioned proceeding pursuant to Sec. 2.714 of the Nuclear Regulatory Commission's rule of practice and states:

INTEREST OF PETITIONER IN PROCEEDING

1. The Keystone Alliance is an unincorporated association comprised of citizens and residents of the five county Greater Philadelphia area, including Philadelphia, Delaware, Chester, Montgomery and Bucks Counties. Members reside and/or own property within a 10 mile radius of the Limerick Generating Station, as well as a larger area out to approximately 50 miles from the Limerick Station. The large majority of members are ratepayers to the Philadelphia Electric Company, the owner and proposed operator of the Limerick Station.

2. All members are interested in the protection of themselves and their neighbors from potential hazards of nuclear plant operation and fuel cycle supporting operations, and developing the most economical and efficient energy resources. Members have undertaken numerous activities disseminating information about these topics.

3. The Keystone Alliance, by its past and present activities and conduct, has exhibited a special interest in the protection of Delaware Valley residents from all nuclear related potential hazards, and is first and foremost concerned that such nuclear power plants not be built when

it is not in the public interest to do so. Petitioner is pledged to oppose the use of nuclear power as an electric generation source where it is unsafe, uneconomical or unnecessary. The petitioner has analyzed and studied, to the extent information has been available, the Limerick Generating Station, Units 1 and 2, and is concerned that their operation will have deleterious public health and safety, environmental and economic effects on its members and residents of the Delaware Valley, which effects could be avoided.

3. The Keystone Alliance, in addition to its educational activities on the above issues, has been an active intervenor in the last three rate cases of the Philadelphia Electric Company before the Pennsylvania Public Utility Commission, and is an active intervenor in the current Public Utility Commission investigation into the need for and economy of the Limerick Generating Station.

HOW THE INTERESTS OF PETITIONER WILL BE AFFECTED BY THE OUTCOME OF PROCEEDING

4. The Keystone Alliance believes that its members and residents of the Greater Philadelphia area will be subject to adverse health and safety consequences as a result of operation of the Limerick Nuclear Generating Station. Petitioner also believes that Limerick operation will produce deleterious environmental effects, and will unnecessarily raise electric rates.

AREAS OF INTERVENTION

5. Keystone Alliance areas of intervention include plant safety, emergency planning, adequacy of emergency planning zones, siting, population density, risk assessment, security, operator training, radiation monitoring and protection, transportation of nuclear materials, nuclear

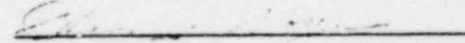
waste disposal, availability of water supply, environmental impact of Station and water supply projects, external threats to plant (e.g., airplane crash, seismic conditions, etc.), management competence, financial qualifications of applicant, need for power and economics of available alternatives.

WHEREFORE, petitioner Keystone Alliance requests leave to intervene in the above-captioned proceeding.

Respectfully submitted,

Keystone Alliance

By:


Alan J. Nogee
3700 Chestnut Street
Philadelphia, PA 19104

Representative of Petitioner

Date: September 18, 1981

AFFADAVIT

COMMONWEALTH OF PENNSYLVANIA:

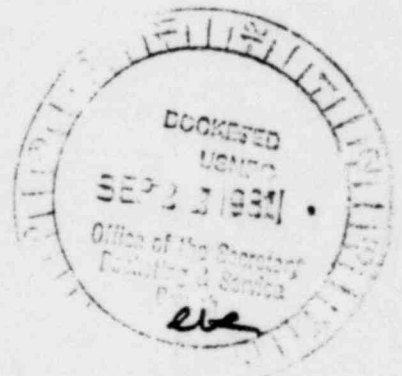
COUNTY OF PHILADELPHIA :

Alan J. Noguee, being duly sworn according to law, deposes and says that he is the duly authorized representative of the Keystone Alliance to represent it in the foregoing petition and in this proceeding, and that the facts contained in the foregoing petition are true and correct to the best of his knowledge, information and belief.

Alan J. Noguee

Sworn and subscribed
before me this 1st day
of Sept., 1981.

Samuel Ann Ahlert
Notary Public



CERTIFICATE OF SERVICE

Alan J. Noguee, duly authorized representative of the Keystone Alliance, hereby certifies that on September 18, 1981, he served the foregoing Petition For Intervention on the Executive Legal Director of the Nuclear Regulatory Commission, Washington, D.C. 20555 and on the attorney for the applicant, Troy B. Conner, Esq., Conner & Wetterhahan, 1747 Pennsylvania Avenue, N.W., Washington, D.C. 20006, both by first-class mail.

Alan J. Noguee

Sworn and subscribed
before me this 18 day
of Sept, 1981.

James A. Allen
Notary Public

