

DOCKETED
November 2, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 NOV -3 P1:28

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

VIRGINIA ELECTRIC
AND POWER COMPANY

)
) Docket Nos. 50-338/339-OLA-1
)
)

(North Anna Power Station,
Units 1 and 2)

APPLICANT'S ANSWER TO PETITION FOR LEAVE
TO INTERVENE OF LOUISA COUNTY, VIRGINIA
AND THE BOARD OF SUPERVISORS OF LOUISA COUNTY

Applicant, Virginia Electric and Power Company ("Vepco"),
files the following Answer to the Petition for Leave to Intervene
filed by Louisa County and the Board of Supervisors of the County
(collectively, the "County"), which was served on Vepco by mail
on October 22, 1982.

I.

Petitioners's Interest

The County has adequately established an interest in the
proceeding and how that interest may be affected by the results
of the proceeding, in accordance with 10 C.F.R. § 2.714 (1982).

II.

Petitioner's Contentions

The County has adequately stated at least one specific
aspect of the subject matter of this proceeding as to which it
wishes to intervene. Under 10 C.F.R. § 2.714(a)(3)(1982), the
County may amend its petition up to 15 days prior to the holding
of the first prehearing conference. Pursuant to 10 C.F.R.

§ 2.714(b)(1982), the County has until 15 days prior to the first prehearing conference to file a list of the contentions that it will seek to have litigated in this proceeding and a reasonably specific statement of the basis for each such contention. Applicant will respond to the Petitioners' contentions after the list has been filed. Applicant wishes to reserve the right to raise at that time any arguments that address the admissibility of the contentions, including any arguments that it might have made at this time.

III.

Consolidation

Applicant has no objection to consolidating this proceeding with the ongoing proceeding in which Applicant has applied for amendments to its North Anna operating licenses that would authorize installation and use of neutron-absorbing spent fuel racks in the North Anna Units 1 and 2 spent fuel pool. Applicant does not agree, however, that either shipment of spent fuel from Surry to North Anna or expansion of a North Anna Unit 3 spent fuel pool is an appropriate subject for consideration in either proceeding. Applicant will address those issues, if they are raised, when the County has filed the list required by 10 C.F.R. § 2.714(b)(1982).

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

By: *Marcia R. Gelman*
/s/ Marcia R. Gelman
Marcia R. Gelman, Counsel

Of Counsel

Michael W. Maupin
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Marcia R. Gelman

HUNTON & WILLIAMS
P. O. Box 1535
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Dated: November 2, 1982

CERTIFICATE OF SERVICE

I hereby certify that I have this day served Vepco's Answer to Petition for Leave to Intervene of Louisa County and the Board of Supervisors of Louisa County upon each of the persons named below by depositing a copy in the United States mail, properly stamped and addressed to him at the address set out with his name:

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

Sheldon J. Wolfe, Chairman
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Washington, D.C. 20555

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By: *Marcia R. Gelman*
/s/ Marcia R. Gelman
Marcia R. Gelman, Counsel for
Virginia Electric and Power
Company

Dated: November 2, 1982