

November 2, 1982
DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 NOV -3 P1:28

In the Matter of
VIRGINIA ELECTRIC
AND POWER COMPANY

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

(North Anna Power Station,
Units 1 and 2)

APPLICANT'S ANSWER TO PETITION FOR LEAVE
TO INTERVENE OF CONCERNED CITIZENS OF LOUISA COUNTY

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

I.

Petitioner's Interest

Petitioner 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

Petitioner has stated what it terms "specific contentions."
These contentions, however, are not specific, and Applicant
construes them as aspects of the subject matter of this
proceeding as to which Petitioner wishes to intervene.
Petitioner has adequately stated at least one 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), Petitioner 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), Petitioner 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.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

Marcia R. Gelman

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

Of Counsel

Michael W. Maupin
James N. Christman
Patricia M. Schwarzschild
Marcia R. Gelman

HUNTON & WILLIAMS
P. O. Box 1535
Richmond, Virginia 23212

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 Concerned Citizens 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
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Marcia R. Gelman

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

Dated: November 2, 1982