

November 2, 1982  
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USNRC

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of  
  
VIRGINIA ELECTRIC  
AND POWER COMPANY

)  
) Docket Nos. 50-338/339-OLA-2  
)  
)

(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 the 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

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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 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

Dr. Jerry Kline  
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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