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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE COMMISSION

In the Matter of){	
){	Docket No. 50-446-CPA
TEXAS UTILITIES ELECTRIC){	ASLBP No. 92-668-01-CPA
COMPANY, et al.){	(Construction Permit Amendment)
){	
(Comanche Peak Steam Electric){	
Station, Unit 2)){	

CASE'S MOTION FOR LEAVE TO FILE RESPONSE
AND
CASE'S RESPONSE TO PORTIONS OF PETITIONERS' MOTION
TO STAY ISSUANCE OF FULL POWER LICENSE(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound
Energy)1426 S. Polk
Dallas, Texas 75224
214/946-9446

March 22, 1993

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NUCLEAR REGULATORY COMMISSION

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(continued)

ATTACHMENTS:

- ATTACHMENT A -- January 30, 1990, letter from James E. Lyons, Chairman, NRC Allegation Review Committee, to Mrs. Betty Brink, Board Member, Citizens for Fair Utility Regulation (CFUR), Subject: Allegation OSP 89-A-0089, pages 10-13 and cover pages.
- ATTACHMENT B -- February 18, 1993, letter from James L. Milhoan, Regional Administrator, NRC Region IV, to W. J. Cahill, Jr., Group Vice President, Nuclear Engineering and Operations, TU Electric, Subject: OI Investigation 4-90-007.
- ATTACHMENT C -- March 8, 1993, "Appellants' Motion to Dismiss Appeal" filed in the U. S. Court of Appeals for the Third Circuit.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE COMMISSION

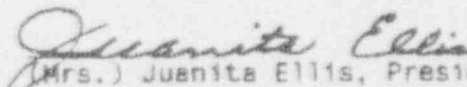
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LIMITED NOTICE OF APPEARANCE

Notice is hereby given that the undersigned representative enters an appearance in the above-captioned matter for the limited purpose of filing the attached CASE's Motion for Leave to File Response and CASE's Response to Portions of Petitioners' Motion to Stay Issuance of Full Power License. In accordance with paragraph 2.713(b), 10 CFR, Part 2, the following information is provided:

Name:	(Mrs.) Juanita Ellis, President CASE (Citizens Association for Sound Energy)
Address:	1426 S. Polk Dallas, Texas 75224
Telephone Number:	214/946-9446
Admissions:	Representative of CASE before Atomic Safety and Licensing Board, U. S. Nuclear Regulatory Commission, Docket Nos. 50-445-OL, 50-446-OL, and 50-445-CPA
Name of Party:	CASE (Citizens Association for Sound Energy)

Respectfully submitted,


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound
Energy)

Dated at Dallas, Texas
this 22nd day of March, 1993

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NUCLEAR REGULATORY COMMISSION

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PETITIONERS' MOTION TO STAY ISSUANCE OF FULL POWER LICENSE

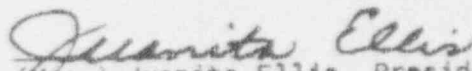
On March 15, 1993, Michael D. Kohn, David K. Colapinto, of Kohn, Kohn and Colapinto, P. C., on behalf of Petitioners B. Irene Orr and D. I. Orr, filed "Petitioners' Motion to Stay Issuance of Full Power License" (Motion) in the Construction Permit Amendment proceedings for the Comanche Peak Steam Electric Station (CPSES), Unit 2, Docket No. 50-446-CPA. CASE has received a copy of Petitioners' Motion.

CASE (Citizens Association for Sound Energy) was an Intervenor in three previous CPSES dockets: 50-445-OL, 50-446-OL, and 50-445-CPA. Portions of Petitioners' Motion, when read in combination with the statement of Ronald Jones attached thereto, imply untrue and potentially slanderous statements regarding CASE which CASE believes must be addressed in order to assure that the record accurately reflects the facts and so that this tribunal will not be misled.

CASE moves that the Commission grant CASE leave to file the attached Response to Portions of Motion of Petitioners B. Irene Orr and D. I. Orr to Stay Issuance of Full Power License.

Mrs. Juanita Ellis, as CASE President, is authorized by the CASE By-Laws to be CASE's primary spokesperson; in addition, Mrs. Ellis has been specifically authorized by CASE Board Resolution to act on behalf of CASE regarding the CASE/TU Electric Settlement Agreement and the CASE/TU Electric/NRC Staff Joint Stipulation. Further, Mrs. Ellis was accepted as a lay representative of CASE in NRC Docket Nos. 50-445-OL, 50-446-OL, and 50-445-CPA. CASE therefore further requests that the Commission recognize CASE President Juanita Ellis as CASE's representative for the limited purposes of filing this pleading and the attached CASE Response.

Respectfully submitted,


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound
Energy)

1426 S. Polk
Dallas, Texas 75224
214/946-9446

Dated at Dallas, Texas
this 22nd day of March, 1993