

Citizens Against Nuclear Power
2309 Weymouth Court
Raleigh, North Carolina 27612

DOCKETED
USNRC

'82 MAY 13 P1:26

IN THE MATTER OF CAROLINA POWER & LIGHT)
Co. et.al. (Shearon Harris Nuclear Power Plants),) Amendment to petition
Dockets 50-400 and 50-401) for leave to intervene

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Citizens Against Nuclear Power (CANP) filed a petition for leave to intervene in the above captioned proceedings by letter posted from Raleigh, N.C. on Feb. 27, 1982. As this petition was judged to be timely filed, and this amendment is merely to add detail and specificity to that amendment, CANP now moves that this amendment be considered timely filed for purposes of considering the petition for leave to intervene.

CANP makes the following amendments:

CANP was founded in December, 1977 as a non-profit, volunteer group of citizens in the area of Raleigh, N.C. concerned about the proposed construction and subsequent operation by Carolina Power & Light Company of a nuclear power station at New Hill, N.C.

CANP requests leave to intervene as an organization on behalf of its members. Appended hereto below are sworn statements by several CANP members, which statements set forth their individual interests in the above captioned proceedings and their individual requests that CANP represent them in these proceedings.

CANP member John Cowgell, 621½ Brooks Ave., Ral., N.C., 27607, is duly authorized by CANP's membership to serve as CANP's representative in the above captioned proceedings. Mr. Cowgell's written notice of appearance is attached hereto below.

The aspects of the above captioned proceeding with respect to which CANP wishes to intervene include, but are not limited to:

1. The adequacy of evacuation and other emergency planning providing for the safety of nearby life and property in the event of a substantial radiation release at the Shearon Harris Nuclear Power Station (SHNPS).
2. The safety-related adequacy of SHNPS's engineering design, particularly that of the steam generators.
3. The safety-related adequacy of construction practices in the building of SHNPS.
4. The adequacy of Carolina Power & Light's managerial capacity for the safe operation of SHNPS.
5. The adequacy of radiation protection for the surrounding communities envisioned by SHNPS engineering design and the adequacy of the radiobiological data base on the basis of which the health effects of emitted radiation exposure are evaluated.

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6. The adequacy of radiological monitoring of environmental releases envisioned for SHNPS, particularly in view of the lack of any provision for multi-site continuous radiological monitoring conducted independently of Carolina Power & Light Co.

The undersigned, Patricia T. Newman and Slater E. Newman, first being duly sworn, depose and say that they are Co-coordinators of Citizens Against Nuclear Power, have read the foregoing amendment of the petition to intervene and affirm that the same is true to the best of their knowledge and belief.

Signed Patricia T. Newman

Patricia T. Newman, Co-coordinator,
Citizens Against Nuclear Power

Signed Slater E. Newman

Slater E. Newman, Co-coordinator,
Citizens Against Nuclear Power

Dated this day of May 10, 1982

Affirmed and subscribed before me this 10th day of May, 1982.

Donna J. Davis Notary Public

My Commission Expires 8-23-84

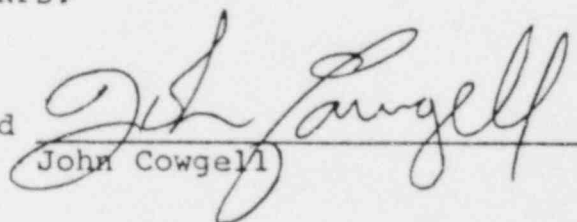
AFFIDAVIT OF JOHN COWGELL

I am John Cowgell and I live at 621½ Brooks Avenue, Raleigh, North Carolina, within 25 miles of the site of the SHEARON HARRIS NUCLEAR POWER STATION (SHNPS). I am employed as manager of Universal Printing & Publishing Co. of 1901 Smallwood Drive, Raleigh, North Carolina, also within 25 miles of SHNPS.

I believe that the normal operation of SHNPS will pose radiological threat to my health and that both foreseen and unforeseen accidental radioactivity releases from SHNPS threaten not only my health but also my livelihood, inasmuch as a substantial accident would necessitate local evacuation and consequent disruption of the local economy and loss of business to my firm.

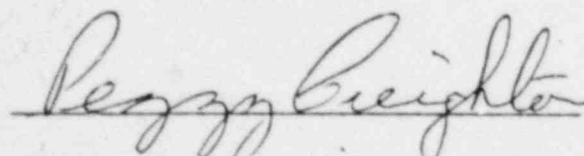
I am a member of Citizens Against Nuclear Power (CANP), 2309 Weymouth Court, Raleigh, North Carolina and have authorized CANP to represent me and my interests in NRC proceedings concerning the licensing of SHNPS.

Signed


John Cowgell

Dated this day of May 3, 1982.

Affirmed and subscribed before me, this 3rd day of May, 1982.

 Notary Public

My commission expires Feb. 24, 1985.

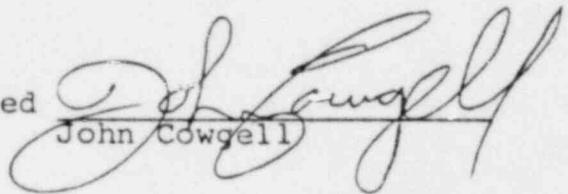
621½ Brooks Avenue
Raleigh, NC 27607
May 3, 1982

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

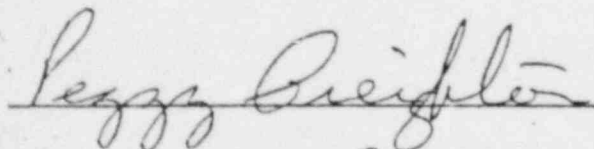
I, John Cowgell, 621½ Brooks Avenue, Raleigh, North Carolina 27607, (Tel: 919/821-5021), having been duly authorized by Citizens Against Nuclear Power (CANP) 2309 Weymouth Court, Raleigh, North Carolina 27612, to represent CANP in any NRC proceedings for which CANP holds intervenor standing, do herewith file written notice of appearance pursuant to the provisions of 10 C.F.R. ~~of~~ 2.713(b).

Signed


John Cowgell

Dated this day of May 3, 1982.

Affirmed and subscribed before me, this 3rd day of May, 1982.

 Notary Public

My Commission expires Feb. 24, 1985.

AFFIDAVIT OF PATRICIA T. NEWMAN

I am Patricia T. Newman. I live at 2309 Weymouth Court, Raleigh, North Carolina within 25 miles of the site of the SHEARON HARRIS NUCLEAR POWER STATION.

I have personal property at 2309 Weymouth Court, Raleigh, North Carolina and jointly own with Slater E. Newman real property at that address and at 315 Shepherd Street, Raleigh, North Carolina. Both sites are within 25 miles of the site of the Shearon Harris Nuclear Power Station.

I believe that the normal operation of the Shearon Harris Nuclear Power station will pose radiological threat to my health and that both foreseen and unforeseen accidental radioactivity release from the Shearon Harris Nuclear Power Station will threaten my health and the value of my property.

I am a member of Citizens Against Nuclear Power (CANP), 2309 Weymouth Court, Raleigh, North Carolina and have authorized CANP to represent me and my interests in NRC proceedings concerning the licensing of the Shearon Harris Nuclear Power Station.

Signed

Patricia T. Newman
Patricia T. Newman

Dated this day of

May 10, 1982

Affirmed and subscribed before me this 10th day of May, 1982.

Anna J. Davis

Notary Public

My Commission Expires 8-23-84

AFFIDAVIT OF SLATER E. NEWMAN

I am Slater E. Newman. I live at 2309 Weymouth Court, Raleigh, North Carolina within 25 miles of the site of the SHEARON HARRIS NUCLEAR POWER STATION.

I have personal property at 2309 Weymouth Court, Raleigh, North Carolina and jointly own with Patricia T. Newman real property at that address and at 315 Shepherd Street, Raleigh, North Carolina. Both sites are within 25 miles of the site of the Shearon Harris Nuclear Power Station.

I believe that the normal operation of the Shearon Harris Nuclear Power Station will pose radiological threat to my health and that both foreseen and unforeseen accidental radioactivity release from the Shearon Harris Nuclear Power Station will threaten my health and the value of my property.

I am a member of Citizens Against Nuclear Power (CANP), 2309 Weymouth Court, Raleigh, North Carolina and have authorized CANP to represent me and my interests in NRC proceedings concerning the licensing of the Shearon Harris Nuclear Power Station.

Signed Slater E. Newman

Slater E. Newman

Dated this day of May 10, 1982

Affirmed and subscribed before me this 10th day of May, 1982.

Donna Davis

Notary Public

My Commission Expires 8-23-84

2512 Kenmore Drive
Raleigh, N.C. 27608
May 4, 1982

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Commissioners:

1. We are Phyllis Mahon Tyler and Lloyd P. Tyler. We live at 2512 Kenmore Drive, in Raleigh which is roughly 20 miles from the Shearon Harris Nuclear Power Plant.
2. We own personal and real property at this address.
3. We feel that the Shearon Harris Nuclear Power Plant is a threat to our health, property, and livelihood.
4. We are members of Citizens Against Nuclear Power and wish them to represent our interests in Nuclear Regulatory Commission proceedings regarding the licensing of the Shearon Harris Nuclear Power Plant.

Phyllis Mahon Tyler
Phyllis Mahon Tyler

Lloyd P. Tyler
Lloyd P. Tyler

Notary: Francis J. Cotten 5-5-82
State: North Carolina County: Wake

My Commission Expires October 14, 1985