



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 APR 26 P1:44

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Before the Atomic Safety and Licensing Appeal Board

In the Matter of	)	
	)	
CONSUMERS POWER COMPANY	)	Docket Nos. 50-329 CP
	)	50-330 CP
(Midland Plant, Units 1 and 2)	)	(Remand Proceeding)

SAGINAW VALLEY NUCLEAR STUDY GROUP'S  
MOTION TO TERMINATE ORAL ARGUMENT

The Saginaw Valley Nuclear Study Group, by its attorneys,  
hereby requests the Appeal Board to cancel oral argument in this matter  
set for May 13, 1982 upon the following grounds:

1. Oral argument in this cause is unnecessary. Voluminous  
briefs have been filed by the parties to this cause, including a brief  
permitted to be filed on behalf of the Atomic Industrial Forum, Inc.  
as Amicus Curiae.

2. In addition to the briefs, the record is also available  
to the Appeal Board and this Intervenor respectfully submits that the  
time and expense which counsel and the Appeal Board will incur in  
having oral argument in this cause is not warranted.

3. To the extent that the Appeal Board has any questions  
of counsel, the Appeal Board could direct such questions to counsel  
which could be answered more efficiently by letter.

4. The issue before the Appeal Board is relatively simple  
and involves the legal issue as to whether the Licensing Board erred

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in not issuing sanctions based upon the findings it made. All of the available law has been submitted to the Appeal Board.

WHEREFORE, the Saginaw Valley Nuclear Study Group submits that oral argument is unnecessary and respectfully requests that it be canceled.

Respectfully submitted,

SAGINAW VALLEY NUCLEAR STUDY GROUP

By: \_\_\_\_\_  
One of Their Attorneys

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PROOF OF SERVICE

I certify that a copy of the foregoing Motion was served upon counsel for Consumers Power Company, Dow Chemical Company, The Atomic Industrial Forum, Inc., the Regulatory Staff and the Secretary of the Nuclear Regulatory Commission (docketing) by mailing a copy of same, postage prepaid and properly addressed, on April 22, 1982. On the same date an original and three copies of the foregoing Motion were served upon the Secretary of the Appeal Board by express mail, postage prepaid and properly addressed.

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