

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND
LICENSING BOARD

In the Matter of Carolina Power and
Light Company, et al. (Shearon Har-
ris Nuclear Power Plants, Units 1
and 2)

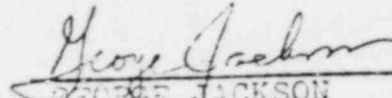
Dockets 50-400, -401
May 12, 1982

MOTION BY THE ENVIRONMENTAL LAW PROJECT

Now comes the Environmental Law Project (ELP), which has filed a petition for leave to intervene in the above-captioned dockets, and moves that the Board, pursuant to 10 C.F.R. 2.715(a), consolidate the ELP with the Chapel Hill Anti-Nuclear Group Effort (CHANGE). The ELP makes this request because it believes that although its interest and the interest of CHANGE may be somewhat different, it and CHANGE will be presenting substantially the same questions and representing substantially the same interests.

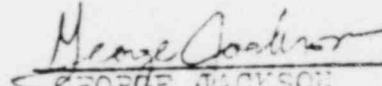
The ELP also believes that the interests asserted in its original petition for leave to intervene, as amended, will be adequately represented by consolidation with CHANGE, and requests the Board grant this motion. The ELP does not waive any rights by making this motion, other than the right to participate and appear as an individual party-intervenor. The ELP will accept service through CHANGE and its mailing address of P.O. Box 524, Chapel Hill, NC 27514;

all further inquiries and/or replies or other communications should be directed to that address.


GEORGE JACKSON
Secretary, ELP

CERTIFICATE

I hereby certify that copies of this motion have been served on the parties listed below, by deposit of same in a U.S. mail repository box, first class postage pre-paid, addressed as indicated below, this 14th day of May, 1982.


GEORGE JACKSON
Secretary, ELP

Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch, 50-400 & -401
Washington, DC 20555

Mr. George Trowbridge
Shaw, Pittman, Potts, and Trowbridge
1800 K. St., NW
Washington, DC 20036

AFFIDAVIT

I have read and understand the motion, and am willing to have my interests represented as stated therein.

Date 14 May 1982 Signed George Jackson
GEORGE JACKSON

I have read and understand the motion, and am willing to have my interests represented as stated therein.

Date 14 May 1982 Signed M. Alex Charns
M. ALEX CHARNS

I have read and understand the motion, and am willing to have my interests represented as stated therein.

Date 13 MAY 1982 Signed Stephen Sizemore
STEPHEN SIZEMORE

ACKNOWLEDGEMENT

I have read and understand the motion and have no objection to it.

Date 14 May 82 Signed Daniel F. Read
DANIEL F. READ
President, CHANGE
P.O. Box 524
Chapel Hill, NC 27514