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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NOS. 50-382

LOUISIANA POWER & LIGHT COMPANY

(WATERFORD STEAM ELECTRIC STATION,
UNIT 3)

PETITION FOR LEAVE TO PARTICIPATE AS AN INTERESTED
STATE IN FACILITY OPERATING LICENSE PROCEEDINGS
AND FOR A HEARING OF THE ISSUE RAISED
SUA SPONTE ON MARCH 18, 1982



I. IDENTIFICATION OF PETITIONER

The State of Louisiana on its own behalf, and on behalf of its citizens petitions the Nuclear Regulatory Commission (NRC) for leave to participate in the above-captioned matter pursuant to the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR, Part 2, at §2.714 (a)(1).

Petitioner is a state, represented by the Attorney General, William J. Guste, Jr. Its objectives and purposes include:

1. To promote the interests and rights of all citizens in the State of Louisiana, in harmony with the general welfare of our state and nation, by whatever means.

2. To represent the interests of the citizens of Louisiana before legislative and administrative bodies at the national, state and local levels, and where appropriate, to provide assistance to Louisiana citizens in pursuing judicial remedies provided by law.

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A number of petitioner's citizens live within 15 and 30 miles of the proposed facility, and as represented by their police jury have requested the Attorney General to intervene in this proceeding as an intervenor without opposition to the operating license. An even larger number of petitioner's citizens obtain their drinking water from the Mississippi River adjacent to over which the proposed facility is to be located.

II. INTERESTS OF THE PETITIONER

The interests of petitioner and the Louisiana citizens it represents which may be affected by the results of this proceeding are the potential financial, health, safety and environmental problems associated with this nuclear power station.

III. SPECIFIC ASPECTS OF THE SUBJECT MATTER FOR WHICH INTERVENTION IS SOUGHT

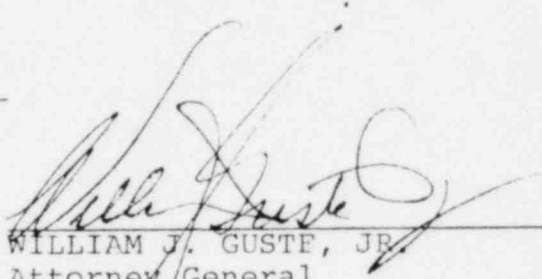
Intervenor believes that without its intervention adequate consideration will not be given in this proceeding to its views in regard to:

1. The reliability of one Shutdown Heat Removal System on the System 80 design as evaluated in
2. Whether, in the broader view, the feed and bleed system to (EFWS) be evaluated to provide back up for the Emergency Feed Water System is adequate or Rowsome & Murphy estimates.
3. Whether there are other back up systems to EFWS to provide back up in the event of the EFWS failure.
4. Whether the issue of a Shutdown Heat Removal System is merely generic or is sufficiently at issue in this proceeding to be handled at this licensing stage.
5. The risk assessment reasonably determined for all EFWS.

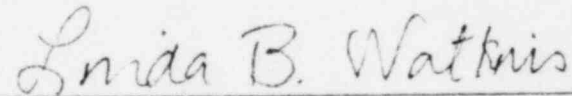
IV. CONCLUSION

Petitioner prays that the specific contentions to be made by petitioner be considered and included as part of the conditions of such operating license.

DATED: _____



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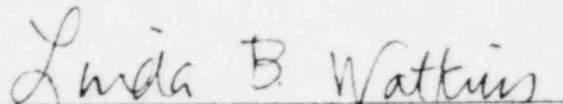
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COUNSEL FOR STATE OF LOUISIANA

V.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing petition for leave to participate was mailed on the _____ day of _____, 1982, postage pre-paid, first class U.S. Mail to the following:


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Assistant Attorney General

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