

Alan S. Rosenthal, Chairman  
Dr. John H. Buck  
Michael C. Farrar

Docket No. 50-466

## BRIEF IN SUPPORT OF APPEAL

(1) the publication of notice in the Federal Register only is a denial of fair notice and due process;

(2) the Supplemental Notice of Intervention Procedures dated July 12, 1979 published in the Federal Register is defective in requiring Petitioners to state that they failed to file petitions for leave to intervene pursuant to the Board's prior notices because of the restrictions in those notices; the defective notices are tantamount to no notice and the requirement of a statement of proof of intimidation by the restrictions in prior notices denies due process;

(3) PATRICIA L. STREILEN in fact failed to intervene because of the restrictions in the prior notices; her information was newspaper accounts which accurately set out the restrictions of the prior notices.

Respectfully submitted,

Stephen A. Doggett

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