

(4) The Board formulation and treatment of these issues denies intervenors relief specifically mandated by the Commission in said Memorandum and Order.

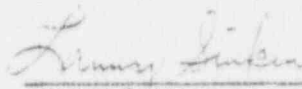
(5) The hearing on these issues is scheduled to begin on May 12, 1981.

(6) These matters require expeditious treatment.

Should the Commission decide the Appeal Board should hear this motion first, intervenors request the Commission so indicate to the Appeal Board. The Appeal Board is receiving service of this motion at the same time as the Commission to aid in achieving an early consideration and determination on the merits.

Intervenors move the Commission to reverse the Board denial of the motion and grant the relief requested in the motion or, in the alternative, that the Commission direct certification of the questions contained in the motion.

Respectfully submitted for
Citizens Concerned About Nuclear
Power, Inc. and Citizens for
Equitable Utilities,

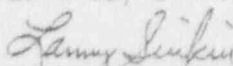


LANNY SYTKIN

March 22, 1981

Certificate of Service

I hereby certify that the foregoing NOTICE OF APPEAL AND REQUEST FOR DIRECTED CERTIFICATION has been served on the following individuals and entities by deposit in the U.S. Mail, first class, postage prepaid on this 25th day of March, 1981.


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EXHIBIT 1

This Exhibit is the motion as filed with the Atomic Safety and Licensing Board except that attachment citations and attachments are added, the introductory history is corrected to include material typist left out, and the discussion is re-ordered to correct typist's incorrect ordering.

