

39
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE



IN THE MATTER OF:)
GENERAL PUBLIC UTILITIES NUCLEAR)
(Three Mile Island Nuclear) Docket No. 50-289 (CH)
Station, Unit No. 1))

MR. HUSTED'S ANSWER TO
TMIA'S REQUEST FOR
LEAVE TO INTERVENE
IN THE HEARING GRANTED CHARLES HUSTED

1. Three Mile Island Alert, Inc. (TMIA) has an adequate interest in the proceeding and has adequately set forth how that interest may be affected by the results of the proceeding.

2. TMIA has adequately set forth the specific aspect or aspects of the proceeding as to which it wishes to intervene.

3. As Mr. Husted views the Request for Leave to Intervene, TMIA has not set forth any contention that it seeks to have litigated in this proceeding. Under 10 C.F.R. § 2.714(b), of course, TMIA need not have done so at this stage of the proceeding. One might infer from TMIA's Request, however, that it may desire eventually to enlarge the issues in this proceeding beyond those specified in the

8511050231 851101
PDR ADOCK 05000289
G PDR

DS03

Notice of Hearing. Thus, Mr. Husted wishes it understood that, in submitting this Answer, he does not intend to foreclose any position that he may wish to take in the future with respect to any contention that TMIA may make in this proceeding.

Respectfully submitted,

By s/Maria C. Hensley
Counsel for Charles Husted
Hunton & Williams
P.O. Box 1535
Richmond, Virginia 23212

Of Counsel

Michael W. Maupin
Hunton & Williams
P.O. Box 1535
Richmond, Virginia 23212

Dated: November 1, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

IN THE MATTER OF:)
GENERAL PUBLIC UTILITIES NUCLEAR)
) Docket No. 50-289(CH)
(Three Mile Island Nuclear)
Station, Unit No. 1))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Mr. Husted's Answer to TMIA's Request for Leave to Intervene in the Hearing Granted Charles Husted," dated November 1, 1985, were served upon those persons on the following Service List by deposit in the United States mail, first class, postage prepaid, this 1st day of November, 1985

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Chief, Docketing and Service Section

The Honorable Morton B. Margulies
Administrative Law Judge
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

George E. Johnson, Esq.
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Maxine Woelfling, Esq.
Office of Chief Counsel
Department of Environmental Resources
505 Executive House
P.O. Box 2357
Harrisburg, Pennsylvania 17120

Deborah B. Bauser, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Louise Bradford
Three Mile Island Alert
1011 Green Street
Harrisburg, Pennsylvania 17102

/s/ Maria C. Hensley
Maria C. Hensley
Counsel for Charles Husted

Dated: November 1, 1985