June 13, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety and Licensing Board

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY,	)	Docket Nos. 50-440 50-441
	)	
(Perry Nuclear Power Plant, Units 1 and 2)	)	

APPLICANTS' ANSWER TO OCRE'S MOTION TO FILE CONTENTIONS ON SNM LICENSE APPLICATION

On May 10, 1983, intervenor Ohio Citizens for Responsible Energy ("OCRE") submitted a motion to admit five new, late-filed contentions.1/ OCRE's untimely contentions are based on Applicants' August 30, 1982 application to the Nuclear Regulatory Commission ("NRC") for a license pursuant to 10 C.F.R. Parts 30, 40 and 70 authorizing the storage of unirradiated reactor fuel and associated radioactive material ("SNM license application").2/ Applicants oppose admission of these

---

1/ In accordance with the Licensing Board's ruling, answers to this motion are due ten days after the close of the hearing on quality assurance issues, Tr. 1011, a date which the Licensing Board subsequently specified to be June 1, 1983, Tr. 1874. Since the tenth day following June 1 was a Saturday, the due date is Monday, June 13, 1983. See 10 C.F.R. § 2.710.

2/ Although referred to as the "SNM [special nuclear material] license application", the August 30, 1982 application

(Continued Next Page)

D503

untimely contentions on several grounds. The proposed contentions are outside the Licensing Board's jurisdiction. They are unjustifiably late. Some constitute challenges to Commission regulations or are moot. And the contentions lack the requisite basis and specificity.

I. JURISDICTION OF THE LICENSING BOARD

OCRE argues that the Licensing Board has the power to decide upon the scope of its jurisdiction and that NRC precedent supports a finding that the Licensing Board has jurisdiction in this matter. OCRE's analysis mischaracterizes the precedent on which it relies. The better view is that the Licensing Board should not exercise its jurisdiction over the SNM license application. In any event, whether or not the Board has jurisdiction, the contentions should not be admitted for the reasons set forth in Sections II - III of this Answer.

Applicants agree with OCRE that the Licensing Board is authorized to decide the extent of its own authority. Duke Power Co. (Perkins Nuclear Station, Units 1, 2, and 3),

---

(Continued)

covers equipment containing only source material (depleted uranium used in a storage cask for irradiated neutron detectors) and byproduct material (radioactive antimony in neutron sources) as well as items containing special nuclear material (in-core neutron detectors containing 0.07688 grams of enriched uranium, and the unirradiated fuel bundles themselves).

ALAB-591, 11 N.R.C. 741, 742 (1980); Kansas Gas and Electric Company, (Wolf Creek Generating Station, Unit 1), ALAB-321, 3 N.R.C. 293, 298 (1976). However, Commission precedent should lead the Licensing Board to conclude that it does not have jurisdiction over the SNM license application.

The starting point for the analysis is the oft-recognized holding that the Licensing Board's jurisdiction is limited by the Commission's notice of hearing. Commonwealth Edison Co. (Zion Station, Units 1 and 2), ALAB-616, 12 N.R.C. 419, 426 (1980); Public Service Co. of Indiana (Marble Hill Station, Units 1 and 2), ALAB-316, 3 N.R.C. 167, 170-1 (1976). In this proceeding, both the Notice of Opportunity for Hearing, 46 Fed. Reg. 12372 (1981), and the Notice of Hearing, 46 Fed. Reg. 22090 (1981), specify that the hearing is to relate to the operating license application for the Perry facility. Thus, this Board's jurisdiction does not extend to the SNM license application.

OCRE cites two cases to support its jurisdiction argument. The first decision, Cincinnati Gas and Electric Co. (William H. Zimmer Nuclear Station), LBP-79-24, 10 N.R.C. 226 (1979), involved a licensing board's consideration of a motion to "delay delivery of fuel" to the reactor site. The motion was made after NRC had issued the special nuclear material license authorizing the receipt of the fuel. The licensing board's

consideration of the motion (which it ultimately denied) was based upon the provisions of 10 C.F.R. § 2.717(b). That provision gives a licensing board explicit authority to modify an order issued by the Director of Nuclear Materials Safety and Safeguards (the official who issues SNM licenses). Since the NRC has not yet issued the SNM license requested by Applicants, 10 C.F.R. § 2.717(b) is not applicable -- and therefore, neither is the Zimmer decision.

The second decision cited by OCRE is the Commission's decision in Pacific Gas and Electric Co. (Diablo Canyon Nuclear Power Plant, Units 1 and 2), CLI-76-1, 3 N.R.C. 73 (1976). In Diablo Canyon, the licensing board held a hearing on an SNM license application and denied the intervenor's motion to prevent delivery and storage of unirradiated fuel. See 3 NRC at 74. There appears to have been no objection made to the licensing board's assertion of jurisdiction. The Commission, in reviewing intervenor's request for appellate review of the licensing board's decision, "confirm[ed] the Licensing Board's assertion of jurisdiction in this instance". 3 N.R.C. at 74, fn.1 (emphasis added). The Commission noted that licensing boards may be given jurisdiction over proceedings involving materials license applications, citing 10 C.F.R. § 2.721. After pointing out that licensing board jurisdiction is normally set forth in the notice of hearing, the Commission stated,

> Although the notice of hearing establishing the present board did not explicitly reference the materials license in question here, the license is integral to the Diablo Canyon project, and it does not appear that any interested person was actually prejudiced by the lack of such a reference. Given the Board's familiarity with the Diablo Canyon project, it made good practical sense for it to hear and decide the related issues raised by the Part 70 materials license application.

Id. (emphasis added).

Unlike Diablo Canyon, an "interested person" -- the Applicants -- will be "actually prejudiced" if the Licensing Board assumes jurisdiction over the SNM license application and admits OCRE's untimely contentions. This prejudice takes several forms. First, it would prevent Applicants from challenging OCRE's standing to intervene on SNM license application issues. While Applicants were willing to accept as "at least marginally adequate" the standing of the one OCRE member to file the requisite affidavit, see Tr. 136, we believe that his residence some 30 miles from Perry is inadequate to support standing with respect to the SNM license application. The second form of prejudice is Applicants' loss of its ability to immediately appeal an order admitting one or more of the contentions. If a separate proceeding were involved, Applicants would have an immediate right to appeal such an order. 10 C.F.R. § 2.714a. These two examples of prejudice to Applicants render the jurisdictional outcome in Diablo Canyon inapplicable to the present case.

For the reasons set forth below, the contentions should be rejected as untimely and for failing to meet the requirements of 10 C.F.R. § 2.714. But even if the Licensing Board were somehow to find the contentions acceptable, the Board should decline to exercise its jurisdiction over them.

II. UNTIMELINESS OF THE CONTENTIONS

OCRE acknowledges that its contentions are untimely, but claims that it has met the five factors specified in 10 C.F.R. § 2.714(a) on which late-filed contentions are to be judged. A consideration of these factors demonstrates that OCRE has not justified its untimely filing.

OCRE's argument on the first factor, good cause for not filing on time, is based on its claimed failure to learn of Applicants' August 30, 1982 SNM license application until it received a copy of a March 29, 1983 letter from the NRC Staff to Applicants. This argument fails. OCRE is under "an ironclad obligation to examine the publicly available documentary material pertaining to the facility in question with sufficient care to enable it to uncover any information that could serve as the foundation for a specific contention". Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), ALAB-687, slip op. at 13 (August 19, 1982). Wholly apart from the availability of the August 30, 1982 application in the NRC's Public Document Room in Washington, D.C.3/ for some nine months

---

3/ There is no requirement under the regulations governing the SNM license application, 10 C.F.R. Parts 30, 40 or 70, for

(Continued Next Page)

before OCRE filed its contentions, essentially all the information in the SNM license application is contained in the Final Safety Analysis Report for the Perry facility and has therefore been readily available to OCRE for several years. See, e.g., §1.8 (personnel experience), § 4.2.2 (fuel description), § 9.1.1 (storage in New Fuel Storage Vault), § 9.1.2 (storage in Fuel Handling Building and containment), § 9.1.4 (fuel handling system), § 9.5.1 (fire protection system), § 13.1 (training and experience), §§ 12.1, 12.3 and 12.5 (health physics and ALARA). The FSAR even identifies the use of neutron sources (§ 12.2.1.2.6) and in-core neutron detectors (§ 7.6.1.4)4/ New fuel storage and handling was also discussed at length in the Staff's Safety Evaluation Report, NUREG-0887, May 1982, §§ 9.1.1 - 9.1.3, as was training and experience (§ 13.1.2), and health physics/ALARA (§ 12). Thus, by no stretch of the imagination can OCRE argue that it lacked access

---

(Continued)

a local public document room. Indeed, there is no requirement for a local public document room even for applications under 10 C.F.R. Part 50 (such as operating license applications). Vermont Yankee Nuclear Power Corp. (Vermont Yankee Nuclear Power Station), ALAB-179, 7 A.E.C. 159, 184 (1974).

4/ The only item covered by the SNM license application which is not specifically discussed in the FSAR is the storage cask for irradiated neutron detectors. However, the cask is not specifically mentioned by OCRE and, in any event, involves only source material in the form of depleted uranium (i.e., uranium with less than the naturally occurring percentage of U-235).

to sufficient information to serve as the foundation for its contentions until April 1983. Essentially all the information it needed has been readily available to OCRE since the start of this proceeding.5/ Good cause cannot be created by the appearance of a new document which repeats previously available information. See Memorandum and Order (Concerning Motion to Submit a Late-Filed Shift Rotation Contention)(November 15, 1982) slip op. at 2; Memorandum and Order (Concerning Sunflower's Late-Filed Radiation-Dose Contention)(September 15, 1982), slip op. at 2.

The second factor to be considered under 10 C.F.R. §2.714(a) is the availability of other means to protect OCRE's interests. Since OCRE has never identified what interests it has that might need protection, it is difficult to respond to this issue. Regardless of what its interests might be, another procedure does exist -- the procedure set forth in 10 C.F.R. § 2.717(b) and used by the licensing board in Zimmer. Still another available procedure is a request for an order to show cause pursuant to 10 C.F.R. § 2.206.

5/ It is interesting to note that, except for the March 29, 1983 letter from the Staff, the other sources for OCRE's allegations are quite old. See, e.g., OCRE Attachment 1 (August 4, 1981 letter from CEI), Attachment 2 (September 5, 1982 newspaper clipping), Attachment 3 (City of Mentor ordinance dated December 19, 1978); reference to July 1982 ACRS meeting (Motion at 9).

The third factor, OCRE's ability to assist in developing a sound record, does not help OCRE's case. Although OCRE states that it "has demonstrated its ability to contribute in this manner on other issues", Motion at 11, this claim even if accurate as a general proposition does not give OCRE carte blanche approval for its abilities. See Memorandum and Order (Concerning Motion to Submit a Late-Filed Shift Rotation Contention)(November 15, 1982). OCRE has pointed to no special abilities regarding the subject matter of the SNM license application.

The fourth factor, representation of OCRE's interests by other parties, might be viewed as weighing in OCRE's favor, although the NRC Staff (which is an "existing party") is charged by statute to review the SNM license application from the standpoint of the public health and safety.

The final factor, broadening the issues and delaying the proceeding, weighs heavily against OCRE. Indeed OCRE concedes that "some delay and broadening of the issues may occur". Motion at 11. Since the Licensing Board has already ruled that the delay criterion weighed against a late contention filed by OCRE nine months ago, Memorandum and Order (Concerning Motion to Submit a Late-Filed Shift Rotation Contention), supra at 2, it certainly weighs against OCRE's current untimely contentions.

Under no conceivable balancing process can OCRE be deemed to have rationalized its tardiness in submitting contentions on the SNM license application. OCRE has failed to justify its untimely filing of the five contentions and they should be dismissed on this ground alone.

III. ADEQUACY OF CONTENTIONS

A. Need for NEPA Cost/Benefit Analysis

OCRE's first contention asserts that NRC must prepare an environmental impact statement before granting the SNM license. There are numerous reasons why this contention does not set forth an issue suitable for litigation in this proceeding.

The first and most obvious reason is that the NRC has already issued an environmental impact statement. "NUREG-0884, the Final Environmental Statement related to the Operation of Perry Nuclear Power Plant, Units 1 and 2, issued in August 1982, covers all phases of operation of the Perry units. Since NUREG-0884 describes the environmental impacts associated with plant operation -- which by definition must encompass the much less significant consequences associated with the SNM license application -- OCRE's complaint is completely moot.

The second reason invalidating this contention is 10 C.F.R. § 51.5(d)(4). This regulation states:

> (d) Unless otherwise determined by the Commission, an environmental impact statement, negative declaration, or environmental impact appraisal need not be prepared in connection with the following types of actions:
>
> * * * * * *
>
> (4) Issuance of a materials license ....

The Commission has not "otherwise determined" that an impact statement is required for the SNM license application. OCRE's arguments seeking to avoid the clear direction of § 51.5(d)(4) are simply directed to the wrong entity. The Commission retains the authority to determine exceptions to § 51.5(d)(4), not a licensing board. See 10 C.F.R. § 51.5(d)(4); 10 C.F.R. § 2.758.

OCRE's attempt to distinguish this case from the rule established by § 51.5(d)(4), notwithstanding the inappropriateness of that attempt before the Licensing Board, is wide of the mark. OCRE's first claim, Motion at 2, is that the fuel shipment date of July 1983 is unnecessarily early. Even if this claim were relevant, Amendment 2 to the SNM license application states that the "term of the license is requested to begin August 10, 1984", a date consistent with the December 1984 forecasted fuel load date. OCRE then claims that Applicants would be financially harmed by having to bear the financial costs of storing the unirradiated fuel and decay of

neutron sources. Since the requested date for the license has been changed, this claim is now moot. In any event, the economic costs of shipment and storage of new fuel are not to be considered in NRC licensing proceedings; only to the extent that they affect the cost-benefit balance are they relevant. Cincinnati Gas and Electric Co., supra at 230. Since no cost-benefit balance is required here, id. and 10 C.F.R. § 51.5(d)(4), and since in any case OCRE is not even alleged that the overall cost-benefit balance for Perry could possibly be affected, this claim provides no support to OCRE. OCRE's concern about the symbolism of an SNM license and the effectiveness of democracy, Motion at 4, while interesting rhetoric, is irrelevant to NEPA issues. OCRE's third point, the cost to the public for activities under the SNM license and for medical costs is totally unsupported; it is also encompassed by the overall cost-benefit balance already performed for the Perry Plant.6/ OCRE's fourth point, that license issuance would deliteriously affect OCRE's fund-raising efforts, is simply irrelevant. OCRE's fifth point, that NEPA requires an environmental impact statement for a SNM license, is no more than a direct attack on Commission regulations. And, as noted above, NRC has already performed a full NEPA review for the

---

6/ The time for OCRE to complain about issues raised by the Final Environmental Statement has long since passed.

Perry project which envelops the activities under the SNM license.

B. Transportation Laws

OCRE's second contention is that Applicants have not demonstrated how they (or General Electric Company, which will actually perform the shipping of unirradiated fuel to the Perry site) will comply with state and local laws concerning the transportation of radioactive materials.

The short answer to this allegation is that there is no requirement that Applicants make such a demonstration. OCRE cites no NRC regulation which requires that such a demonstration be made. While a procedure exists to consider such transportation issues, that system exists wholly apart from NRC and its jurisdiction. An elaborate system has been developed to regulate the transportation of "hazardous materials", including radioactive materials. The Hazardous Materials Transportation Act, 49 U.S.C. §§ 1801 et seq. ("HMTA") provides for the preemption of any local restrictions on the shipment of radioactive materials inconsistent with requirements established by the U.S. Department of Transportation ("DOT"). DOT has established those requirements in Docket No. HM-164, 49 C.F.R. § 177.825. The HMTA mechanism is, of course, independent of NRC licensing requirements.

A second reason for rejecting this contention is that NRC is not required to await determination of compliance with state law. In a decision involving the issuance of the Perry construction permits, the Appeal Board rejected the argument that an alleged failure to obtain an approval required by state law was cognizable before the NRC. As the Appeal Board stated, these matters

> are questions of Ohio law for decision by [the state agency], subject to review by the Ohio courts. If the Ohio authorities want construction of the plant stopped pending the [state agency's] decision on the merits of intervenor's complaint, that is their prerogative. Our job is to decide the Federal issues before us.

Cleveland Electric Illuminating Co. (Perry Nuclear Power Plant, Units 1 and 2), ALAB-443, 6 N.R.C. 741, 748 (1977). See, also, Southern California Edison Co. (San Onofre Nuclear Generating Station, Units 2 and 3), ALAB-171, 7 A.E.C. 37, 39 (1974).

The third reason for rejecting this contention is that the ultimate relief which Intervenors appear to seek has already been provided. OCRE's "bottom line" seems to be a desire that the NRC perform a "balancing of risks and benefits resulting from the use of radioactive materials, particularly for the use Applicants request, i.e., the generation of electricity from nuclear energy". Motion at 8. That balancing, including a "detailed cost/benefit analysis", id., has of course already been performed in the Staff's Final Environmental Statement.

And to the extent that OCRE's concerns focus particularly on transportation, the NRC has established by regulation the environmental impacts of transportation. 10 C.F.R. § 51.20(g) and Table S-4. A challenge to those values is not permitted in this proceeding. Philadelphia Electric Co. (Limerick Generating Station, Units 1 and 2), LBP-82-43A, 15 N.R.C. 1423, 1501, 1511 (1982).

C. Training and Experience

OCRE's third contention asserts that Applicants "are not qualified to use the SNM since they have insufficient training and experience". Motion at 8. The primary basis for the contention is that

> Applicants as a whole (CAPCO) have operated 2 other nuclear plants, Davis-Besse and Beaver Valley.

Motion at 9. According to OCRE, the operating record of these plants shows that Applicants "are not qualified to use the materials requested in the SNM application." In the first place, The Cleveland Electric Illuminating Company, which has sole responsibility for operating Perry, has no interest whatsoever in the operating Beaver Valley unit.7/ As to

---

7/ Beaver Valley Power Station, Unit 1, is jointly owned by Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company. It is operated by Duquesne Light Company.

Davis-Besse, of which CEI is a co-owner, CEI is not the operating utility. Thus, allegations concerning operation of the Davis-Besse facility are irrelevant. Cf. Special Prehearing Conference Memorandum and Order, LBP-81-24, 14 N.R.C. 175, 214 (1981).

OCRE also cites a statement made by the chairman of the Advisory Committee on Reactor Safeguards on the low level of commercial nuclear operating experience. Motion at 9. Since the SNM license application does not involve operation of the Perry facility, the ACRS comment is not applicable to the SNM license application.8/ OCRE has shown no basis even for speculating that the level of training and experience set forth in the FSAR (Table 1.8-1)(and referenced in the SNM license application) is not fully adequate for the activities covered by the SNM license application.

8/ Although OCRE claims that the term "use" in 10 C.F.R. § 70.23 somehow includes the "eventual utilization of the SNM", Motion at 10, thereby making plant operation relevant to the SNM license application, the language of § 70.23 explicitly restricts the "use" of the material "for the purpose requested". Applicants' SNM license application obviously does not seek authorization to use the SNM in operating the plant -- that is the subject of the operating license application.

D. Financial Qualifications

OCRE's fourth contention asserts that 10 C.F.R. § 70.23(a)(5) requires that NRC determine that an SNM license applicant is financially qualified to engage in activities within the scope of 10 C.F.R. Part 70. OCRE further argues that Issue No. 2 should therefore be readmitted in connection with the SNM license application.

OCRE's premise for this contention is faulty. NRC's regulations do not require a finding of financial qualifications in connection with the issuance of an SNM license. Section 70.23(a)(5) allows the Commission to determine that such a finding is necessary on a case-by-case basis. Such a determination has not been made in this case. Section 70.23(a)(5) states:

> (a) An application for a license will be approved if the Commission determines that:
>
> * * * * * *
>
> (5) Where the nature of the proposed activities is such as to require consideration by the Commission, the applicant appears to be financially qualified to engage in the proposed activities in accordance with the regulations in this part.

Unlike 10 C.F.R. Part 50 (both prior to the recent amendment and as it remains in effect for non-utility applicants) which requires all applicants to demonstrate financial

qualifications, the obligation to demonstrate financial qualifications under Part 70 only applies "where the nature of the proposed activities is such as to require consideration by the Commission". The Commission has not determined that a finding of financial qualifications is required for a SNM license of the type involved here.9/ Indeed, having determined by regulation that financial qualifications need not be shown for electrical utilities to operate a nuclear power plant, the Commission could not conceivably require a consideration of financial qualifications for a utility merely to store unirradiated fuel.

Readmission of Issue No. 2 (which incidentally was a Sunflower, not an OCRE, issue) would also be inconsistent with OCRE's attempt to litigate SNM license application issues in the operating license proceeding. OCRE is trying to argue that the operating license proceeding should cover matters which are governed by another licensing proceeding, while simultaneously arguing that the rules governing the operating license proceeding should not apply. OCRE cannot have it both ways. Readmission of Issue No. 2 would also be improper since Issue

---

9/ Commission practice is to grant licenses to utilities for the receipt and storage for unirradiated power reactor fuel without a determination of the applicant's financial qualifications. See, e.g., License No. SNM-1878, Docket No. 70-2937 (Sept. 10, 1981).

No. 2 dealt with the "reasonable assurance of obtaining the funds necessary to cover the estimated costs of operation, including the costs of reasonably forseeable contingencies, for Perry Nuclear Power Plant, Units 1 and 2". Special Prehearing Conference Memorandum and Order, LBP-81-24, 14 NRC at 195 (emphasis added). The SNM license application does not deal with the operation of Perry.

Finally, OCRE has provided absolutely no basis for its contention. It merely states that "concerns about Applicants' financial qualifications advanced by intervenors are still valid" and that "Applicants have attributed the delays in the construction completion date of PNPP to difficulty in obtaining funds". Motion at 10. Nowhere does OCRE even indicate an awareness of the financial qualifications needed to carry out the activities requested by the SNM license application. OCRE identifies the costs of storing fuel for one year to be $638,000. Motion at 4.10/ But OCRE fails to provide any basis for alleging that Applicants are not financially qualified with respect to costs of this magnitude. It is important to note that the financial costs discussed in the context of the now-dismissed Issue No. 2 involved hundreds of millions of dollars,

---

10/ Since the SNM license application requests that the term of the license begin on August 10, 1984, see p. 11, supra, and with a scheduled December 1984 fuel load, Motion at 2, the fuel storage costs would be about $300,000.

not a few hundred thousand dollars. See Special Prehearing Conference Memorandum and Order, LBP-81-24, 14 NRC at 192. The contention has no basis whatever and should be dismissed on that ground alone.

E. Criticality Hazards

OCRE's last contention asks that an exemption which Applicants requested from the requirements of 10 C.F.R. § 70.24 be denied. No extended discussion of this contention is needed since Amendment 2 to the SNM license application has deleted the exemption request. The contention is therefore moot.

IV. CONCLUSION

For all the reasons set forth above, Applicants respectfully request that the Licensing Board deny OCRE's Motion to File Contentions on SNM License Application. The contentions are either moot, lacking in basis, inconsistent with Commission regulations, or suffer from a combination of these deficiencies. They are unjustifiably late. And, even if they were

otherwise valid, they are properly considered to be outside the Licensing Board's jurisdiction.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: _____
JAY E. SILBERG, P.C.
Counsel for Applicants

1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

DATED: June 13, 1983

June 13, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY,	)	Docket Nos. 50-440 50-441
	)	
(Perry Nuclear Power Plant, Units 1 and 2)	)	

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Answer to OCRE's Motion to File Contentions on SNM License Application" were served by deposit in the United States Mail, first class, postage prepaid, this 13th day of June, 1983, to all those on the attached Service List.

JAY E. SILBERG

DATED: June 13, 1983

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY	)	Docket Nos. 50-440 50-441
	)	
(Perry Nuclear Power Plant, Units 1 and 2)	)	

SERVICE LIST

Peter B. Bloch, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

Gary J. Edles, Esquire
Atomic Safety and Licensing
Appeal Board
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 Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James M. Cutchin, IV, Esquire
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Ms. Sue Hiatt
OCRE Interim Representative
8275 Munson Avenue
Mentor, Ohio 44060

Terry J. Lodge, Esquire
824 National Bank Building
Toledo, Ohio 43604

Donald T. Ezzone, Esquire
Assistant Prosecuting Attorney
Lake County Administration Center
105 Center Street
Painesville, Ohio 44077

John G. Cardinal, Esquire
Prosecuting Attorney
Ashtabula County Courthouse
Jefferson, Ohio 44047