

IN THE UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
FOR THE ATOMIC SAFETY & LICENSING BOARD

IN THE MATTER OF:

THE CLEVELAND ELECTRIC ILLUMINATING
COMPANY, et al., [Perry Nuclear
Power Plant, Units 1 and 2]

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Docket Nos. 50-440-OL
50-441-OL

MEMORANDUM OF UNDERSTANDING

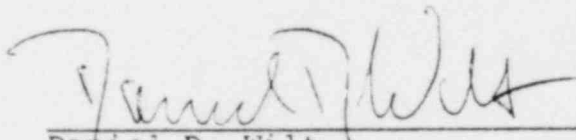
Quite some time ago, this intervenor, Sunflower Alliance, et al., filed a series of discovery requests directed to the Lake County Commissioners and the Lake County Disaster Services Agency. Counsel for Sunflower Alliance has communicated with the attorney for Lake County Commissioners and Lake Disaster Services Agency, Donald T. Ezzone, and Mr. Ezzone has indicated that the request is being worked on and that answers will be filed as soon as the Lake County Commissioners and the Lake County Disaster Services Agency can file the Answers.

As all parties concerned know, this proceeding is moving along toward its eventual culmination at the Licensing Hearings. Thus, Sunflower Alliance, Inc., by its silence does not intend to waive its right to file a Motion to Compel Discovery in the event the Lake County Commissioners and the Lake County Disaster Services Agency for any reason fails to comply with the discovery requests prior to the next special pre-hearing conference. At this time, this intervenor has no idea at all when the next special pre-hearing conference, if any, will be scheduled.

While not intending to prejudice itself Sunflower Alliance will uphold the filing of a Motion to Compel Discovery against the

Lake County Commissioners and the Lake County Disaster Services Agency so long as these intervenors are in good faith working on the answers to said discovery requests and not before the next special pre-hearing conference. In this way, it is hoped that Lake County Commissioners and Lake County Disaster Services Agency will have sufficient time to prepare adequate responses to Sunflower's request and at the same time not prejudice Sunflower in the event a Motion to Compel is necessary.

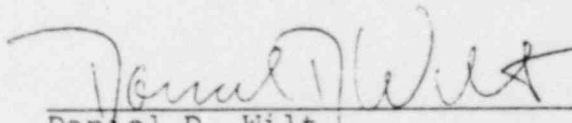
Respectfully submitted



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PROOF OF SERVICE

A copy of this Memorandum has been sent to all those persons listed on the attached Service List on this 14 day of May, 1982.



Daniel D. Wilt
Attorney for Sunflower Alliance, Inc.