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June 1, 1982

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

Re: The Cleveland Electric Illuminating Co., et al.  
(Perry Nuclear Power Plant, Units 1 and 2)  
Docket Nos. 50-440, 50-441

Dear Ms. Hiatt:

For over half a year now, we have had an outstanding discovery request to OCRE for Jeff Alexander's thesis entitled "Population Energetics of the Freshwater Clam Musculium Lacustre." In our first set of interrogatories and request for production of documents to OCRE, dated October 15, 1981, we requested that OCRE describe the nature of Jeff Alexander's research regarding Corbicula. (Interrogatory 25, at p. 12). We also requested that OCRE produce all identified documents. (Document Request, at p. 15). In response to our interrogatory, OCRE identified Jeff Alexander's thesis, and stated that the thesis would be produced for copying. (OCRE Response, dated November 30, 1981, at pp. 10 and 12). In response to another question, OCRE stated that Jeff Alexander had provided information used in preparing OCRE's responses to the Corbicula interrogatories. (OCRE Response, at p. 11). Since then, we have repeatedly requested that OCRE produce the thesis for copying. Despite the fact that you personally have assured us in subsequent telephone conferences that the thesis would be produced, we have yet to receive it. In our latest discovery status report of April 21, 1982, we again noted your failure to produce the thesis -- we received no response.

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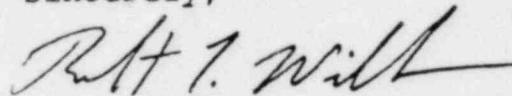
Ms. Sue Hiatt

June 1, 1982

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We are now informed by Mr. Daniel Wilt that you have contacted Jeff Alexander in this regard on several occasions, and that he is ignoring your requests to send you a copy of the thesis. As we have explained in the past, we believe access to the thesis to be essential to the preparation of our case. If, in fact, you cannot produce the thesis, we would like you to confirm this to us by letter as soon as possible so that we can take appropriate action.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. L. Willmore", written in a cursive style.

Robert L. Willmore  
Counsel for Applicants

cc: Service List

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

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