

April 15, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)

CLEVELAND ELECTRIC ILLUMINATING)
COMPANY, Et Al.)

(Perry Nuclear Power Plant,)
Units 1 and 2))

Docket Nos. 50-440

50-441

(Operating License)

OCRE'S FOURTH DISCOVERY PROGRESS REPORT

Pursuant to the directives of the Atomic Safety and Licensing Board's September 9, 1981 Memorandum and Order, LBP-81-35, 14 NRC 682, 689 (1981), Ohio Citizens for Responsible Energy ("OCRE") hereby files its fourth progress report on discovery activities.

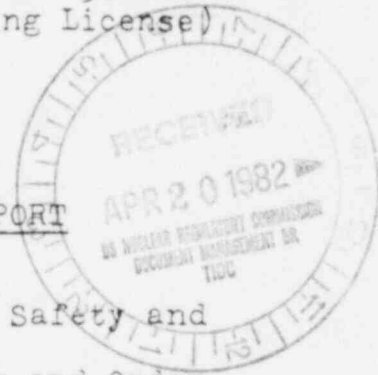
In the past two months, OCRE has received:

1. Applicants' answers to OCRE's first set of interrogatories, with the documents and resumes listed in the Appendix to said answers (dated March 17, 1982), and a corrected response, dated March 25, 1982, to same..
2. NRC Staff answers to OCRE's second set of interrogatories, with the documents listed in Appendix B to said answers (dated March 24, 1982).

Both of these sets of interrogatories dealt with Issue #7, on clam biofouling.

OCRE has not propounded any discovery requests in the past two months. Very shortly, OCRE will file interrogatories to both Staff and Applicants concerning Issue #5, scram discharge volume pipe break. OCRE may request, pursuant to 10

CFR 2.741, the opportunity to inspect the scram discharge



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volume at the Perry site, depending on the answers received to said interrogatories.

The above details OCRE's discovery activities on those issues for which OCRE is lead intervenor. In addition, the undersigned OCRE Interim Representative participated in a conference call with counsel for Sunflower Alliance and counsel for Applicants on March 29, 1982 in an attempt to resolve controversy surrounding interrogatories and requests for production of documents involving the remaining issues, for which OCRE is not lead intervenor. The resolution of said matters is being pursued by Sunflower Alliance, the lead intervenor.


Respectfully submitted,

Susan L. Hiatt

Susan L. Hiatt
OCRE Interim Representative
8275 Munson Rd.
Mentor, OH 44060
(216) 255-3158

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing OCRE'S FOURTH DISCOVERY PROGRESS REPORT were served by deposit in the U.S. Mail, first class, postage prepaid, this 15th day of April, 1982 to those on the Service List below.


Susan L. Hiatt

SERVICE LIST

Peter B. Bloch, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

Dr. Jerry R. Kline
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

Frederick J. Shon
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

James Thessin, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Comm'n

Jay Silberg, Esq.
1800 M Street, N.W.
Washington, D.C. 20036

Daniel D. Wilt, Esq.
7301 Chippewa Rd.
Brecksville, OH 44141

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