

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

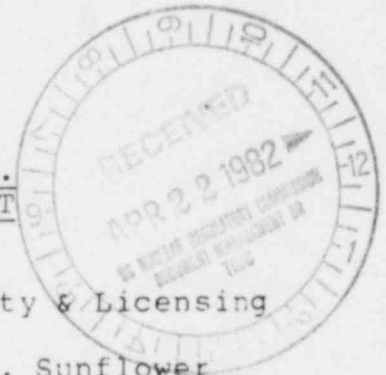
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IN THE MATTER OF:

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

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) Docket Nos. 50-440-OL
) 50-441-OL
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SUNFLOWER ALLIANCE, INC., et al.
FOURTH DISCOVERY PROGRESS REPORT



Pursuant to the Directors of the Atomic Safety & Licensing Board's Memorandum and Order of September 9, 1981, Sunflower Alliance, Inc., et al., hereby files its fourth progress report on discovery activities.

In the past two months, Sunflower Alliance has received answers from the NRC staff to Sunflower's First Set of Interrogatories and has received a response from the NRC staff to Sunflower Alliance's first Request for Production of Documents. Further, Sunflower and counsel for applicant have been attempting to resolve applicant's objections to several discovery requests filed by Sunflower. After several conversations with Mr. Silberg, Attorney for applicant, resolution of applicant's objections was not had and, therefore, a Motion to Compel Discovery will be filed by Sunflower Alliance within the very near future.

Sunflower Alliance also has two sets of Interrogatories and a Request for Production of Documents pending. Counsel for Sunflower has discussed the matter with counsel for Lake County and counsel for Lake County assures counsel for Sunflower that the discovery will be completed without the necessity of a Motion to Compel. However, to date, Lake County Commissioners and Lake County

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Disaster Services Agency has not responded. Therefore, a Motion to Compel Discovery may become necessary.

Contingent No. 8 has recently been admitted as a contention in this proceeding. Sunflower Alliance, Inc., intends to file within the next two-month period a discovery request covering the new contention. In addition, Sunflower Alliance, Inc., intends to file within the next two-month period additional discovery directed to applicant.

Respectfully submitted



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Attorney for Sunflower Alliance,
Inc., et al.

PROOF OF SERVICE

A copy of this Fourth Progress Report has been sent to all persons on the attached Service List on this 16 day of April, 1982.



Daniel D. Wilt
Attorney for Sunflower Alliance,
Inc., et al.