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RELATED CORRESPONDENCE

## SHAW, PITTMAN, POTTS &amp; TROWBRIDGE

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March 18, 1985

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

JAY E. SILBERG, P.C.

Ms. Susan Hiatt  
8275 Munson Avenue  
Mentor, Ohio 44060The Cleveland Electric Illuminating Company  
(Perry Nuclear Power Plant, Units 1 and 2)  
Docket Nos. 50-440 and 50-441 /OC

Dear Sue:

In response to your phone call of March 14, this is to confirm our conversation of today concerning additional discovery on Issue No. 8. Although Applicants consider most of this material to be irrelevant to the contention and all of it to be in the nature of untimely discovery, we will nevertheless make the following available to you:

1. Identification of witnesses and scope of testimony: Other than the individuals whose names I provided to you on March 14 as potential witnesses, we will not have definitive information on actual witness identification or scope of testimony until the testimony is filed.
2. Physical model of PNPP containment structure: Applicants have several physical models of portions of the Perry facility. These models are located at the site and at Gilbert-Commonwealth's offices in Reading, Pennsylvania. You are welcome to examine those which show the containment structure.
3. Nonconformance reports on containment and containment penetrations: The nonconformance reports (which are on microfiche) are not collected for containment and containment penetrations. You are welcome to review available lists of nonconformance reports for the reactor building (which would include those for containment and containment penetrations) and examine those which relate to containment and containment penetration.

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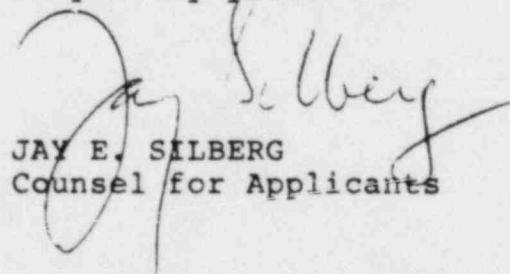
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Ms. Susan Hiatt  
March 18, 1985  
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4. APTECH Report references: The two APTECH reports which you requested (AES-82-01-92 (April 1982) and AES-81-11-88 (November 1981)) are available for your inspection.
5. Procedures concerning operation of the hydrogen control system: Perry-specific emergency procedures have not yet been drafted. Nor does CEI have a completed draft of generic emergency procedure guidelines for combustible gas control.
6. Hydrogen Control Owners' Group Program Plan (updated as of December 1984): This document is available for your review, as is the more recent February 1985 version.

As in the case of your other discovery requests, please contact Mr. Bradley S. Ferrell at Perry (216-259-3737, ext. 5520) to make any necessary arrangements.

Very truly yours



JAY E. SILBERG  
Counsel for Applicants

cc: Service List  
JES:lam

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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