

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)

THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY)

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

Docket Nos. 50-440 and 50-441

* * *

SUNFLOWER'S STATEMENT OF MATERIAL FACTS
(CONTENTION 0)

Now comes Sunflower Alliance and avers the following facts in
opposition to summary disposition of Contention 0:

1. Ashtabula County's Radiological Emergency Response Plan does
not address means by which protective measures within the EPZ would be relaxed.

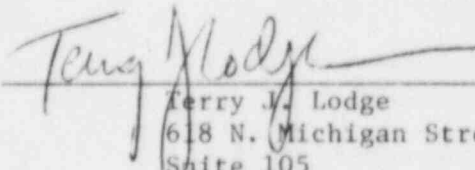
It states in Section M.3:

If contaminated areas are identified, the Ashtabula
County EOC Direction and Control Group will coordi-
nate with the ODSA and the ODH to develop methods
and procedures for decontamination. Depending on
radiation levels, residents may be permitted limited
access to any such areas.

The EOC Direction and Control Group will coordinate
with the ODSA and the ODH on all decisions to permit
reentry to residents of evacuated areas.

Respectfully submitted,

By



Terry J. Lodge
618 N. Michigan Street
Suite 105
Toledo, Ohio 43624
Phone: (419) 255-7552

Counsel for Sunflower
Alliance

8503050354 850302
PDR ADOCK 05000440
G PDR