

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

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SUNFLOWER'S STATEMENT OF MATERIAL FACTS
(CONTENTION Q)

Now comes Sunflower Alliance and sets forth the following facts concerning which there is a genuine issue on Contention Q:

1. Parents of children attending school in the EPZ would very likely attempt to pick them up during an evacuation. The experience of one Ashtabula County bus driver is that parents call the schools if a bus is 10 minutes late in delivering a child home. Affidavit of Barbara Niznik.

2. The expertise of Applicant's affiant, Gary Winters, shows experience solely in natural disasters, not man-made radiological disasters. Winters Affidavit.

3. Bus drivers to this point have not had evacuation training which warrants a conclusion that they would show "prosocial" behavior during an emergency. Niznik Affidavit.

4. The Ashtabula County Radiological Emergency Response Plan contains no letters or contracts committing buses for use in an emergency at Perry.

Respectfully submitted,

By

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