

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
JAN 10 1985

Before the Atomic Safety and Licensing Board

MS-4 AT 35

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 U)

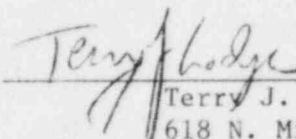
Now comes Sunflower Alliance and avers the following facts in opposition to summary disposition of Contention U:

1. In its report on the November 28, 1984 PNPP emergency drill, FEMA recommended against continued or future use of the one and only decontamination center which was used in the drill. FEMA "Exercise Report" at 62. The report recommends that an adequate location for such a center be established and incorporated into emergency plans. Id.

2. Applicant's "Statement of Material Facts" indicates prospectively that certain contingent events will occur prior to fuel load: fire department personnel "will have been trained," paras. 5 and 6; reception centers "will have emergency kits," para. 7, which will include specific instructions directing where contaminated vehicles "will be impounded," para. 8.

Respectfully submitted,

By



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