

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

APR -4 AM 05

In the Matter of)

THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY)

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

Docket Nos. 50-440 and 50-441

OFFICE OF SECRETARY
DOCKETING & SERVICE

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SUNFLOWER'S STATEMENT OF MATERIAL FACTS
(CONTENTION Z)

Now comes Sunflower Alliance and sets forth the following as material facts in opposition to the granting of summary disposition on Contention Z:

1. The only evacuation training for bus drivers was given in 1984, and was attended by fewer than half of all drivers. Affidavit of Barbara Niznik accompanying Sunflower response to motion for summary disposition of Contention Q.

2. At least one bus driver in the EPZ has had no explanation of dosimetry use, an overview of the offsite emergency plans, or instruction on an individual driver's duties. Niznik Aff., Id.

3. Present emergency plans do not contemplate evacuation "before any significant radiation release," as claimed by Applicant, but rather only after Emergency Action Levels measure 1 rem whole body/5 rem thyroid. PNPP Emergency Plan, p. 4-32.

Respectfully submitted,

By

Terry J. Lodge

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

8503050438 850302
PDR ADOCK 05000440
G PDR