

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 BB)

Now comes Sunflower Alliance and sets forth the following facts in
opposition to summary disposition of Contention BB:

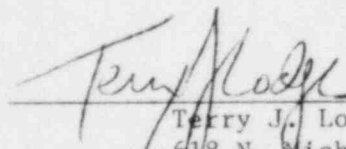
1. Applicant states that previously-existing deficiencies identified by FEMA "are being" resolved, but does not state that they are resolved. Applicant's "Statement of Material Facts," para. 5.

2. FEMA identified as problems in its review of the November 28, 1984 drill at Perry that staff at Ashtabula County Medical Center "had to improvise the means to attempt to decontaminate the patient." FEMA "Exercise Report," January 18, 1985 at 12. This has been confirmed as an outstanding deficiency by the more recent Affidavit of Dr. Robert L. McTrusty, Disaster Planning Liaison at the Medical Center, which accompanies Sunflower's responses to summary disposition of Contention P.

3. FEMA also considers deficient the adequacy of field monitoring of radiation levels. "Exercise Report," p. 24.

Respectfully submitted,

By



Terry J. Lodge
618 N. Michigan Street
Suite 105
Toledo, Ohio 43624

Counsel for Sunflower Alliance

8503050471 850302
PDR ADOCK 05000440
G PDR