

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)

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Docket Nos. 50-440 and 50-441

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SUNFLOWER'S STATEMENT OF MATERIAL FACTS
(CONTENTION JJ)

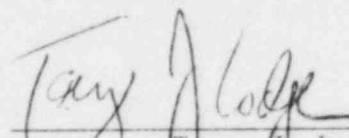
Now comes Sunflower Alliance and sets forth the following facts in
opposition to summary disposition of Contention JJ:

1. The Grand Valley School District in Ashtabula County has a
policy of refueling school buses only when the tanks are 1/4 or less full.
Affidavit of Barbara Niznik accompanying Sunflower's responses to summary dis-
position of Contention Q.

2. Niznik has not been instructed of her specific duties during
an emergency at PNPP. Id.

Respectfully submitted,

By



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

Counsel for Sunflower
Alliance

8503050487 850302
PDR ADOCK 05000440
G PDR

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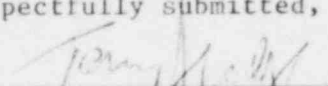
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SUNFLOWER'S CERTIFICATE OF SERVICE OF CERTAIN DOCUMENTS

I hereby certify that a copy of the following documents was served by me this 2nd day of March, 1985 by regular U.S. Mail, postage prepaid, upon the parties appearing on the attached "Service List", except that those parties having an asterisk (*) by their names were served by express mail on this date. The documents are:

Sunflower's Memorandum in Opposition to Summary Disposition of Contention J;
Sunflower's Statement of Material Facts (Contention J);
Sunflower's Memorandum in Opposition to Summary Disposition of Contention O;
Sunflower's Statement of Material Facts (Contention O);
Sunflower's Memorandum in Opposition to Summary Disposition of Contention Q;
Sunflower's Statement of Material Facts (Contention Q);
Affidavit of Barbara Niznik on Contention Q;
Sunflower's Memorandum in Opposition to Summary Disposition of Contention U;
Sunflower's Statement of Material Facts (Contention U);
Sunflower's Memorandum in Opposition to Summary Disposition of Contention Z;
Sunflower's Statement of Material Facts (Contention Z);
Sunflower's Memorandum in Opposition to Summary Disposition of Contention BB;
Sunflower's Statement of Material Facts (Contention BB);
Sunflower's Memorandum in Opposition to Summary Disposition of Contention CC;
Sunflower's Statement of Material Facts (Contention CC);
Sunflower's Memorandum in Opposition to Summary Disposition of Contention JJ;
Sunflower's Statement of Material Facts (Contention JJ).

Respectfully submitted,


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

SERVICE LIST

- James P. Gleason
Atomic Safety and Licensing Board
* 513 Gilmore Drive
Silver Spring, MD 20901
- Jerry R. Kline
* Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Colleen P. Woodhead, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
- * Jay Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036
- Sue Hiatt
8275 Mentor Avenue
Mentor, Ohio 44060
- Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555