

Aug. 12, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

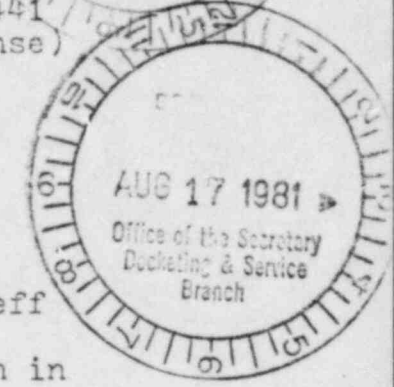
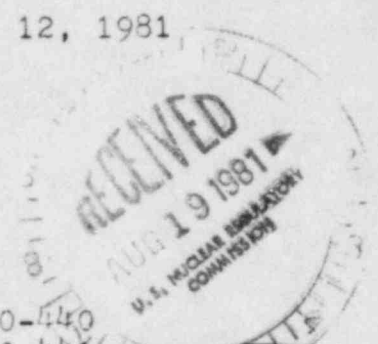
Before the Atomic Safety and Licensing Board

In the Matter of)

CLEVELAND ELECTRIC ILLUMINATING)
COMPANY, et al.)

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

Docket Nos. 50-440
50-441
(Operating License)



I. OHIO CITIZENS FOR RESPONSIBLE ENERGY
("OCRE") NOTICE OF CHANGE OF REPRESENTATIVE

The consensus among current OCRE representative Jeff Alexander and OCRE members is that OCRE's participation in this adjudicatory proceeding would be conducted most expeditiously by designating fellow OCRE member Robert Alexander as the new Interim Representative. Effective immediately and for as long as he is able, all correspondence and communications to OCRE should be directed to the undersigned address of Robert Alexander.

II. SUPPLEMENT TO OCRE'S BRIEF
ON ADMISSIBILITY OF ATWS CONTENTION

Five days earlier, OCRE filed its brief on the admissibility of the Sunflower Alliance' ATWS contention. The following supplement to that brief is seasonable per the Board's request and must be considered.

The most compelling argument for admission of the ATWS contention into this proceeding is that of time. The Staff and industry have quarreled for eleven years over the requirements to be imposed and, given the current progress of the rulemaking on ATWS, it is not likely a final resolution will be had prior

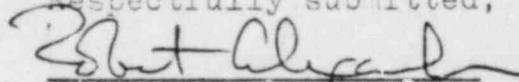
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to FNPP initial decision. At that point, conflicts between Applicant's design and the final rule will inure little to the health and safety of OCRE members.

And should a final rule be reached prior to initial decision, any required modifications to hardware would be very costly, if feasible at all.

To conclude, a rulemaking can be an adequate substitute for the individual litigation of an issue. But it is not adequate when the rulemaking has reached an impasse. Industry will continue to balk at a recommendation for automatic SLCS that can result in a much safer plant but which entails the risk of costly false actuations. This issue must be heard and tried in the above-captioned proceeding.

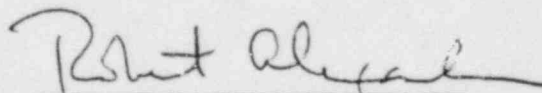
Respectfully submitted,



Robert Alexander,
OCRE Interim Representative
2030 Portsmouth Street #2
Houston, TX 77098

CERTIFICATE OF SERVICE

This is to certify that copies of OCRE's Notice of Change of Representative/Supplement to ATWS Admissibility Brief, dated Aug. 12, 1981, were served upon those persons on the service list below by deposit in the United States mail, postage prepaid, this ___th day of August, 1981.



Robert Alexander

Peter B. Bloch, Chairman, ASLB
Dr. Jerry R. Kline, ASLB
Mr. Frederick J. Chon, ASLB
Docketing and Service Section,
Office of the Secretary
Charles A. Barth,
Office of the Executive Legal Director
Jay E. Silberg, Applicant