

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
CLEVELAND ELECTRIC ILLUMINATING) Docket Nos. 50-440
COMPANY, Et al.) 50-441
(Perry Nuclear Power Plant,) (Operating License)
Units 1 and 2)
)

OCRE DISCOVERY PLAN

Pursuant to the Licensing Board Memorandum and Order of July 28, 1981, the Ohio Citizens for Responsible Energy ("OCRE") now files its discovery plan for the above-captioned proceeding.

This Intervenor confesses a lack of familiarity with the discovery involved in administrative proceedings such as this but has assembled the following plan notwithstanding. Consistent with the wishes it expressed in its "Post-Special Prehearing Conference Brief" filed June 10, OCRE would like to establish two phases of discovery, and thus adopting a "unit and see" return. In first fashion, OCRE will best be able to build on initial responses and contribute more meaningfully. Below is OCRE's two phase plan.

- PHASE I : Oct. 1, 1981 - First set of interrogatories filed;
- Inspection of RPP (at Applicant's convenience but before Jan. 1, 1982)

- Inspection of site (approximately 1½ miles west of Galveston, sanitary sewer facilities, Galveston, at Applicant's convenience but between March and June, 1982)
- Deposition of NRC witnesses

The July 25 Board Order also indicated that OCRE was to be the "lead in the matter" on issues #5 and #7 relating to a pipe break in the SDV and clam biofouling, respectively. That designation, barring dissent from the other intervening parties (and there has been none that OCRE knows of), is satisfactory with OCRE.

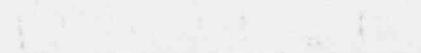
Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that copies of "OCRE Reply to Staff and Applicant's Response To OCRE Contention 1b (Electromagnetic Pulse)" and "OCRE Discovery File", both dated Aug. 19, 1981, were served upon those persons on the service list below by deposit in the United States mail, postage prepaid, this 19th day of August, 1981.



Robert Alexander

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