

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
) (Operating License)
(Perry Nuclear Power Plant,)
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 "wait and see" posture. In that 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 RFV (at Applicant's convenience but before Jan. 1, 1982)

- Installation of sites with 2000-gallon, 10-foot front, sanitary waste facilities; (work, at Applicant convenience but between March and June, 1982)
- Deposition of NRC witnesses

The July 28 Board Order also indicated that OCRE was to be the "lead intervenor" 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,


 Robert Alexander
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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 14 (Electromagnetic Pulse)" and "OCRE Discovery Plan", 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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