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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY & LICENSING BOARD

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IN THE MATTER OF:)
)
CLEVELAND ELECTRIC ILLUMINATING)
COMPANY [Perry Nuclear Power Plants]
Units 1 and 2]

Docket Nos. 50-440-OL
50-441-OL

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U.S. NUCLEAR REGULATORY
COMMISSION

RESPONSE OF SUNFLOWER ALLIANCE, INC., et al., TO
APPLICANT'S REQUEST FOR PRODUCTION OF DOCUMENTS

Sunflower Alliance, Inc., et al., as an intervenor, has fully answered the First Set of Interrogatories propounded to it by Applicant. In our Answers, we have set forth the documents, reports, books and other publications upon which we have relied in preparing the Answers. The vast majority of the material upon which we are relying is either Nuclear Regulatory Commission reports or other readily available material.

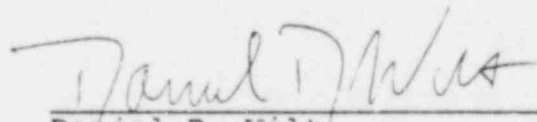
Sunflower Alliance, Inc., as a group of concerned citizens, does not have the financial capability of xeroxing and sending to all parties in this proceeding copies of all of the reports, documents and books set forth in our Answers. It seems to Sunflower Alliance, Inc., that this is not necessary inasmuch as the majority, if not all, of the documents set forth in our Answers to Interrogatories are freely available to the public.

However, if Applicant or other parties would advise Sunflower Alliance, Inc., as to any specific material that is not available in public form which Applicant would seek to have, Applicant may request of the undersigned that specific material and we will

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provide same. It is the hope of Sunflower Alliance, Inc., that by way of this response we can preserve our limited financial resources and at the same time comply with the legitimate needs of Applicant as set forth in Applicant's request.

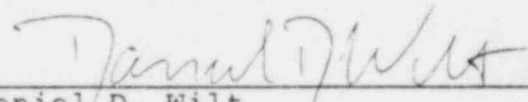
Respectfully submitted



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Inc., et al.

PROOF OF SERVICE

A copy of this Answer to Request for Production of Documents has been sent to all those persons listed on the attached service list by First Class Mail, postage pre-paid, on this 25 day of November, 1981.



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Inc., et al.

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