

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

DOCKET NO.

USNRC

For the matter of:

The Cleveland Electric
 Illuminating Co., et al *81 DEC-4 P4:10
 (Ferry Nuclear Power Plant, Units 1 and 2) *ERL*

Sunflower Alliance, Inc., et al. First Set of Interrogatories to Applicants.

Docket No's:

50-440

50-441

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 U.S. NUCLEAR REGULATORY COMMISSION

December 2, 1981

These Interrogatories (First Set) are files by Sunflower Alliance Inc. et al., pursuant to the previous orders of the Atomic Safety and Licensing Board and pursuant to 10 CFR 2.740 b. These interrogatories are directed to each utility making up the Applicants and pertain to one or more of the seven issues that have been admitted to date in this proceeding.

It is required that each interrogatory be answered separately and fully in writing under oath or affirmation, within 14 days after service. These interrogatories shall be continuing in nature and the answers must be immediately supplemented or amended, as appropriate, should the applicants, or anyone of them, obtain any new or differing information responsive to the Interrogatories.

For purposes of these Interrogatories the term "documents" means all writings and records of every type in the possession, control or custody of the Applicants or any one of them, or of the Applicants' attorney (s), including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings, and all other writings, recordings or video tapes of any kind. "Documents" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of the Applicants.

For purposes of those Interrogatories, a document shall be deemed to be within the 'control' of the Applicants or Applicants' attorney (s) if they have ownership, possession or custody of the document or copy thereof, or have the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

When identification of a document is requested, briefly describe the document, i.e., letter, memorandum, book, pamphlet, etc., and state the following information as applicable to the particular document: name, title, number, author, date of publication and publisher, addresses, date written or approved, and the name and address of the person (s) having possession of the document.

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ISSUE # 1

Applicants emergency evacuation plans do not demonstrate that they provide reasonable assurance that adequate protective measures can and will be taken in the event of an emergency.

STATEMENT OF PURPOSE

The purpose of the interrogatories directed to Issue #1 is to discover whether Applicant has plans that will provide adequate protective measures in the event of an emergency. The information obtained will be used upon the hearing in support of Issue #1.

1. Demonstrate (pursuant to 10 CFR S50.33 (g) and 10 CFR S50.47 (c) (2) that the plume exposure pathway EPZ and the ingestion exposure EPZ for the Perry Nuclear Power Plant have been established with appropriate consideration of local emergency response capabilities as they are affected by demography, topography, land characteristics, and jurisdictional boundaries. In addition, identify who established these EPZ's for Perry, and provide a legible map of each of the EPZ's.
2. NUREG -0644, Rev. 1, concludes at page 13 that the duration of a release from a reactor accident could range from 30 minutes to several days. Explain in detail how plant operators are expected to determine the time duration of a radiological release and how this time duration affects the choice of offsite public protective actions. In addition, fully explain how offsite radiological emergency response plans for Perry take into account the parameters of the duration of release.

3. NUREG- 0644, Rev. 1, concludes at page 19:

"The concept of Emergency Planning Zones (EPZ's) necessarily implies mutually supportive emergency planning and preparedness arrangements by several levels of government: Federal, State and Local governments, including counties, townships and even villages."

Pursuant to this conclusion, demonstrate that, for the Perry Nuclear Power Plant EPZ's, "mutually supportive planning and preparedness arrangements" have been made. Provide full documentation to support the response to this interrogatory.

4. Fully describe and document the Applicants' arrangements with RAP and IRAP. For each capability of these programs relied upon by the Applicant in responding to a radiological emergency, describe each capability in detail and provide the best estimate of the time required for the capability to be implemented at the

Perry Nuclear Power Plant site or environs, including normal weather and abnormal weather conditions (adverse weather, such as heavy snowfall, fog, freezing rain, etc., as appropriate for the Perry Nuclear Power Plant region).

5. For each of the planning and evaluation criteria in NUREG- 0654, Rev. 1 (not the standards but the criteria), demonstrate that each emergency plan for the Perry Nuclear Power Plant site and EPZ's meets the appropriate criteria or provides an equivalent level of protection to the public health and safety.

6. Provide copies of all letters of agreement with agencies and/or organizations and individuals with an emergency response role in the EPZ's or onsite for the Perry Nuclear Power Plant. For each such letter of agreement, demonstrate that the letter specifies the emergency measures to be provided and that the letter includes mutually acceptable criteria for the implementation of such measures (as required by Criterion II.A.3, page 32, NUREG-0654, Rev. 1). For any such agency, organization, or individual, with an emergency response role that does not now have a letter of agreement, discuss whether letters are needed (and why or why not) and discuss when such letters will be obtained. As to those letters of Agreement which require Applicant to bear the costs of emergency planning or bear the costs of enabling the agency, organization or individual to participate in emergency planning then state: A) the cost involved; B) the legal reasons which support Applicants' assumption of these costs; C) the current status of any improvements to be assumed by Applicant for any such agency, organization or individual so that such agency, organization or individual may participate in such emergency plan; specifically state each item which such agency, organization or individual required Applicant to assume prior to such agency, organization or individual's agreement to participate in the emergency plan.

7. A FEMA-sponsored report, Evacuation Planning in the TMI Accident. (January 1980, RS 2-8-34, prepared for FEMA by Human Sciences Research, Inc.), concluded on page 173:

"Volunteers can be highly effective as supporting members of professional emergency management staffs, but they cannot be relied upon over extended periods of threat . . . They cannot . . . be regarded as a substitute for regular staff or as a main-stay of a crucial operating area like communications. Furthermore, they should not be expected to perform on the same basis as professionals over a prolonged, standby period."

Regarding this conclusion, respond to the following:

- A. Do you agree with this conclusion? If not, fully explain why and discuss the basis for your alternative conclusion. Provide copies of all documents relied upon in reaching your conclusion.

- B. If you agree, discuss fully how this conclusion affects the ability of offsite emergency response organizations and agencies to respond to radiological emergencies at Perry and to drills.
- C. Regardless of your position on the above conclusion, for each offsite/onsite emergency response agency or organization, identify by position and by numbers of personnel how many such personnel are volunteers (non-paid personnel who may or may not hold regular jobs).
- D. Fully discuss the impact of reliance of each organization or agency with emergency response responsibilities on volunteers in terms of how such reliance may impact on the ability to maintain a 24-hour a day operation over a protracted period of time (as required by Criterion II.A.4, page 33, NUREG-0654, Rev. 1).

8. For any example initiating condition in Appendix 1 to NUREG-0654, Rev. 1, which is not included within the Applicants' emergency plan, discuss why each such example initiating condition should not be included within the Applicants' emergency plan. Further, for accidents and emergencies involving initiation conditions other than those specified in Appendix 1 to NUREG-0654, demonstrate that there is adequate assurance that the Applicants' operating staff will promptly recognize such initiating conditions and promptly and correctly declare the appropriate emergency class (i.e., Unusual Event, Alert, Site Emergency, or General Emergency).

9. Provide copies of the Applicants' Operating Procedures and/or Emergency Procedures (as appropriate) which contain instructions to plant operators regarding the declaration of an emergency (i.e., Unusual Event, Alert, Site Emergency, or General Emergency) pursuant to Appendix 1 of NUREG-0654, Rev. 1.

10. Pursuant to Criterion II.E.5 of NUREG-0654, Rev. 1, page 45, provide a full and complete description of the system(s) intended to be utilized by State and local governments for disseminating information on plant emergencies to the general public within the EPZ's. Include in your response all applicable procedures, manuals, letters, orders, memoranda, and other applicable documentation; also include the content of messages if such messages are established.

Pursuant to Criterion II.E.6 of NUREG-0654, Rev. 1, page 45, and 10 CFR Part 50, Appendix E, Section IV.D.3, demonstrate that the administrative and physical means to be utilized to notify the public within the plume exposure pathway EPZ within 15 minutes. In your response, provide any and all documents discussing the Perry prompt alert and notification system, including bid specifications, sound surveys, engineering studies, evaluations of alternative hardware and systems, hardware location studies, and theoretical or actual field tests of system coverage. Describe who has the authority to activate the system and under what conditions. In addition, demonstrate that the system can successfully operate under the following conditions: loss of power, rain, icing, lightning, severe snowstorm. Further, demonstrate that the financial and administrative means exist to assure the operability of the system throughout the operating lifetime of the Perry Nuclear Power Plant, and discuss who has responsibility for testing and maintenance of the system once it is installed.

12. Pursuant to Planning Standard G of NUREG-0654, Rev. 1, page 49 and the associated Criteria on pages 49-51, provide a full and complete description of the public education and information programs for the Plume Exposure Pathway EPZ and the Ingestion Exposure Pathway EPZ. Include in your response all written materials prepared for public distribution and for distribution to local and State emergency management personnel which describe the public education and information program. Identify any and all consultants utilized in the preparation of such materials, including the name of the company, name of the principal contact person, business address and business telephone number of the principal contact person.

13. Fully describe the Applicants' Technical Support Center (or its equivalent), and demonstrate that the center meets the criteria and standards set forth in NUREG-0696, Rev. 1.

14. Pursuant to Criterion II.H.8 and Appendix 2 of NUREG-0654, Rev. 1, fully describe the meteorological instrumentation and procedures for the Perry Nuclear Power Plant. Include in your response the sensitivity of the system and the susceptibility of the system to adverse environmental conditions, such as lightning, loss of normal power, damaging winds, hail, and icing.

15. Fully describe any dose projection system intended to be used by the Applicant and/or offsite authorities. Include in your response full design details of the system, including specifications, physical and conceptual limitations of the system, and the accuracy of the system. Fully describe the ability of the system to accurately predict offsite doses under the following conditions: a heated release, releases involving large quantities of radioiodines and/or particulates, and shifting wind patterns, and any combination of these factors.

16. Describe the capacity of Lake County Memorial Hospital East to receive patients suffering from radiation exposure. Describe the system of priorities instituted by Applicant and Lake County Memorial Hospital East in receiving on-site and off-site patients.
17. State the expected number of employees to be on-site during normal operations at each shift if and when Perry Nuclear Power Plant Unit I and II go into operation.
18. Describe the notification system to be used relative to the 50 mile plume ingestion EPZ. Describe in detail the system including but not limited to persons responsible for such notification; the notification system to be employed; the criteria to be used in determining when to issue such notification; the persons to whom such notification will be given in each community or township within the 50 mile EPZ; the physical and conceptual limitations of the notification system; the names and addresses of those individuals responsible for maintaining the integrity of this notification system; the plans Applicant has, if any, to test this system and the names and addresses of all agencies, governments, organizations and individuals who will be involved with such testing.
19. Attached to the May, 1981, revision of Applicants' Emergency Plan are copies of letter agreements with several institutions and local government units. Does this represent all of the letter agreements which Applicant has to date? Set forth Applicants' plans to obtain future letter agreements including the name and address of the organization, be it governmental or not, involved. Set forth the names of all organizations with whom Applicant will have letter agreements on the date, if it occurs, that Perry Power Plant Units I and II will go into operation.
20. Define what is meant by the primary working document of the emergency plan. Sec. 25 of May, 1981, revision Perry Nuclear Power Plant Emergency Plan.
21. Does Applicant have a security plan and procedures and a Health Physics instructions?
22. The emergency plan revision of May, 1981, discusses Emergency Action Levels (EAL). Discuss the following as it specifically relates to each EAL. State the specific parameters, boundaries and criteria of each EAL; state the guidelines issued by Applicant to assist the Emergency Duty Officer or other proper official to assist that official in determining which EAL to implement.
23. State the procedures and criteria adopted by Applicant to assure the ability and effectiveness of Applicants' Emergency Plan. What procedures are to be adopted to update the Emergency Plan?

24. Who are the off-site measuring groups established in section 4.1.4 of the Emergency Plan? What criteria and standards have been adopted to measure the effectiveness and expertise of the off-site measuring groups? What agreements exist between Applicant and the off-site measuring groups and attach copies of each agreement with each off-site measuring group.
25. Describe in specific detail the specialized training and experience requirements of all persons who will hold the positions set forth on pages 5-2 and 5-3 of the Emergency Plan; further, set forth in specific detail the specialized training, experience and qualifications of shift supervisors; set forth in detail the procedures to be employed by Applicant to verify and to continue to verify that subject employees do have and will continue to have the specialized training, experience and qualifications required.
26. Set forth in detail the reasoning behind Applicants' decision not to have an emergency duty officer on-site 24 hours per day, seven days per week. What assurance does Applicant have that substitutes for the emergency duty officer will have the time, experience and ability to perform in an emergency situation in the absence of the emergency duty officer?
27. Set forth in specific detail the training, if any, any off-site organization will receive to respond to any emergency at Perry Nuclear Power Plant. Set forth whether training manuals exist for such training; whether instructors exist for such training; the background, training and expertise of such instructors; the frequency of such instruction and all other details concerning such instruction.
28. What facilities are available, not proposed, to transport members of the public or Perry Nuclear Power Plant staff to Radiation Medical Center Hospital, in Philadelphia, Pennsylvania?
29. Set forth in detail the emergency medical plan adopted by Applicant.
30. Set forth in detail the agreements between Applicant and other off-site organizations, institutions or individuals which will provide security service; towing service; ambulance service; police service; fire service; radio and telephone communications service; meteorological service; medical service not specified in the May , 1981, version of Applicants' Emergency Plan.
31. Set forth in specific detail the provisions and procedures to be employed by Radiation Management Corp. to assure that any individual exposed to excessive radiation will receive prompt evaluation and treatment.

32. Sections 5.6.2.1 to 5.6.2.8 of Perry Nuclear Power Plant Emergency Plan set forth Applicants' expectations of certain civil agencies. Set forth in specific detail the agreements between each of these civil agencies and Applicant which provides Applicant with assurance that the Civil Agencies will perform in the event of an emergency at Perry Nuclear Power Plant. Set forth in detail any training which these Civil Agencies will receive so that the Civil Agencies can respond to an emergency at Perry Nuclear Power Plant. Finally, what assurance does Applicant have that the communication links, and responsibilities by these off-site Civil Agencies will in fact, not theory, be performed?

33. Radiation Management Corporation is not located in the State of Ohio. Why was it chosen to provide emergency medical services in the event of an emergency at Perry Nuclear Power Plant? What assurance does Applicant have that Radiation Management Corporation will have the expertise and capability to respond to emergency conditions at Perry Nuclear Power Plant within 15 minutes of a declaration of emergency at Perry Nuclear Power Plant?

34. What provisions are being made to protect citizens of Canada who are within the 50 mile EPZ? Set forth in specific detail these provisions. If any formal agreements exist, provide such agreements.

35. What is the maximum exposure level an off-site emergency worker is expected to expose himself to during any emergency work? Specify in detail the training and warnings off-site emergency workers will receive before they are expected to expose themselves to radiation doses of any amount.

36. When will the Emergency Operations Facility be planned and implemented? Where will it be located? How will it have access to data displays and information read-outs from the control room?

37. To what extent will Applicant assist the affected counties with the development of County Emergency Operation Centers?

38. When will the comprehensive communications network with backup capabilities be procedural?

39. When will the emergency organization notification system be installed?

40. How is the emergency communications system powered?

41. Describe the layout of emergency warning devices in the control room. What access is there to the multipoint recorders in the control room? If the control room becomes inoperable, describe in specific detail the backup emergency control and warning systems.

42. What type of protection system from radiation exposure is available when entering and leaving the Unit Control Room?

STATEMENT OF PURPOSE

The purpose of the following interrogatories as they relate to issue 3 is to discover information concerning the stop work order of February, 1978.; to discover what steps, if any, were taken to remedy the deficiencies that led to the stop work order, and residual deficiencies related thereto.

43. Specify in specific detail the violations of NRC requirements which resulted in the February, 1978, stop work order. Include in your answer reference to the specific NRC requirement as well as the specific violations. Identify all areas of construction that were affected. Specify the weaknesses in Applicants' Quality Assurance and Quality Control Programs that were exposed by the stop work order.

44. Relative to each violation referred to in Interrogatory 43 stated above, set forth the following:

- A) each time each specific violation was inspected after February, 1978,
- B) the date that each specific violation was cleared;
- C) the date that any further violation of the same NRC requirements was found by an NRC inspector;
- D) the exact response provided by Applicant to the NRC violation both as to the original violation and as to any future violations;
- E) What changes were made in Applicants' Quality Control and Assurance Program; and document the changes as a result of the work stoppage of February, 1978.

45. As a result of the work stoppage of February, 1978, an augmented inspection program was initiated. Specify in detail what the results of this augmented inspection program are. Further, state what violations of NRC requirements were discovered as a result of the augmented inspection caused by the February, 1978, stop work order.

46. Define the term "critical blueprints".

47. What are the specifications for torque-ing of cable tray bolts?

48. Was there any damage to the Unit I containment building dome during placement?

49. What engineering specifications or judgement were used in establishing the Quality Control and Assurance Programs at Perry Nuclear Power Plant. Based on operating experience, has the stop work order of February, 1978, verified or not verified the engineering judgements set forth in the Quality Control and Assurance Program?

50. As a result of the stop work order of February, 1978, have there been changes made in Applicants' Quality Control and Assurance Program? Specify in detail all such changes. Further specify the reasons that the changed requirements of the Quality Control and Assurance Program were not adopted in the original Quality Control and Assurance Program.

ISSUE #4

STATEMENT OF PURPOSE

The purpose of the interrogatories as they relate to Issue #4 is to determine the need for a full scale 30 degree sector steam test; to find out the relationship between Applicants' ECCS and the 30 degree sector steam test; to determine when such a test will be performed.

51. Section 1.5.1.2. of FSAR states that the Applicants' model of core spray distributions will be confirmed by a full scale 30 degree sector steam test.

- A) When will this test be performed?
- B) Will this test be performed on a generic BWR/6 model, or on a specific plant? If this test is not performed on the actual Perry plant, explain how the results of the test can apply to a standard 238 size plant, of which Perry is a prototype (FSAR, p. 1.5-1).
- C) Describe the "full scale 30 degree sector steam test" in detail, including but not limited to the conditions and parameters used for the test, which ECC systems are tested (HPCS, LPSC, LPCI, ADS), whether the diesel generators powering the systems will be tested concurrently, type of LOCA assumed, any ECCS failure modes assumed, and how the operating core accident conditions will be simulated. Supply the test procedures.
- D) Will this test be performed on a fueled and operating reactor? If not, explain why and indicate how this data can apply to an operating reactor.

52. Give the source of the following quotation, attributed to the NRC, found in Section 1.5.1.2 of FSAR: "The NRC has agreed 'that the method for verification of the currently assumed core spray distributions which are used to justify conservatisms of the spray cooling heat transfer coefficients in ECCS-LOCA licensing calculations.'" There is another quotation in the material immediately following in the FSAR. Give the source of this quotation as well.

53. Why is experimental data missing on the safety of Applicants' ECCS?
54. Specify the name and address of the person or organizations who will perform the full scale 30 degree sector steam test.
55. Is the 30 degree sector steam test sufficient to provide a worthwhile data base on a prototype ECCS; on a prototype BWR/6 reactor; on a prototype Mark III containment? Why?

ISSUE #6

STATEMENT OF PURPOSE

The purpose of the following interrogatories is to explore the nature of an ATWS; to determine Applicants' responses to the various consequences of an ATWS; to demonstrate the need for an automated standby liquid control system at Perry Nuclear Power Plant.

56. Based on postulated ATWS accidents, how long would it take after the event occurred before the operators at the control room would discover the event?

57. How long would it take once the operators have determined an ATWS has occurred to implement the SLCS?

58. Once the SLCS has been initiated, specify the time it would take for the SLCS to bring the accident under control.

59. Assuming an automated SLCS was installed at Perry Nuclear Power Plant, how long would it take the automatic SLCS to determine that an ATWS event has occurred, implement the SLCS and bring the accident under control?

60. Specify current Applicant thinking as to when to commence the SLCS after an ATWS has occurred?

61. For BWR's of the type being installed at Perry Nuclear Power Plant, what is the probability of an ATWS occurring?

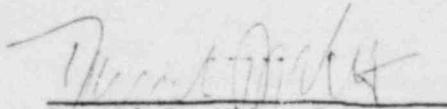
62. For BWR's of the type being installed at Perry Nuclear Power Plant, what is the probability of a common mode failure occurring?

63. Assuming an unmitigated ATWS occurs with the BWR being installed at Perry Nuclear Power Plant, what is the risk of off-site exposure of radiation in excess of the allowable 10 CFR limits.

64. For BWR's of the type being installed at Perry Nuclear Power Plant, what are the probabilities of a pellet-clad interaction failure occurring?

65. In the event of an ATWS event occurring at a BWR of the type being installed at Perry Nuclear Power Plant, what are the probabilities of a core melt-down with the currently installed SLCS and what are the probabilities of a core melt-down with the proposed automatic SLCS?
66. Specify the amount of time saved in the event an ATWS occurs using the automatic SLCS as opposed to the manual SLCS at Perry Nuclear Power Plant?
67. Volume 4 of NUREG-0460 contains what is known as alternate 4A to handle ATWS events. Specifically state all of the factors being relied on by Applicant for not installing the equipment set forth in Alternate 4(A). Demonstrate how the current Applicant response to ATWS (as shown by the equipment installed at Perry Nuclear Power Plant) is superior to Alternate 4(A) of NUREG-0460.
68. Is it not true that Alternate 4(A) (of NUREG-0460) reduce the risk of severe consequences from ATWS by a factor of 100 for BWR's. Demonstrate how Perry Nuclear Power Plant's current response to ATWS is superior to Alternate 4(A) in terms of reducing the risk of ATWS.
69. Demonstrate the ability of the suppression pool to absorb the core heat generated before the SLCS shuts the reactor down. Demonstrate how the ability of the suppression pool to accomplish this result would be improved by the installation of an automatic SLCS.
70. Demonstrate the ability of the High Pressure coolant injection system to keep the core covered following an ATWS.
71. What mechanisms are available at Perry Nuclear Power Plant to reduce the power oscillations in the BWR that would occur after an ATWS?
72. What mechanisms are available at Perry Nuclear Power Plant to reduce dilution of the form injected by the SLCS.
- 73 Submit off-site radiation dose estimates for the worst case transients based on G.E. code CDYN.
74. What training or procedures are available to plant operators in the event of an ATWS?
75. Describe the mechanisms available at Perry Nuclear Power Plant to avoid a pressure regulator failure ATWS.
76. Describe the mechanisms available at Perry Nuclear Power Plant to avoid transition backing.

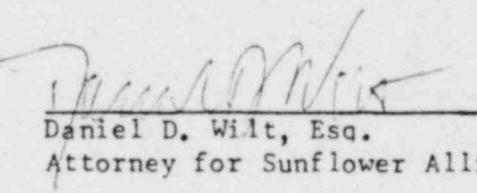
Respectfully submitted,



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PROOF OF SERVICE

A copy of this First Set of Interrogatories to Applicant has been sent to all persons on the attached Service List by regular First Class Mail on this 2nd Day of December, 1981



Daniel D. Wilt, Esq.
Attorney for Sunflower Alliance et al

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