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February 5, 1982
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

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

APPLICANTS' ANSWERS TO
SUNFLOWER ALLIANCE, INC.
FIRST ROUND DISCOVERY REQUESTS

Applicants for their answers to First Round Discovery Requests of Sunflower Alliance, Inc., dated December 2, 1981, state as follows:

Copies of all documents to be supplied with Applicants' answers will be sent to counsel for Sunflower Alliance, Inc., Daniel D. Wilt, under separate cover (documents are listed in Appendix to Applicants' answers). As stated below, arrangements to examine documents at Perry Nuclear Power Plant (see response to Interrogatories #11, #44 and #50) can be made by contacting Rebecca Coffey of The Cleveland Electric Illuminating Company at 216-259-3737.

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In compliance with the Licensing Board's Special Prehearing Conference Memorandum and Order, LBP-81-24, 14 NRC 175, 230-31 (July 28, 1981), Applicants' counsel have conferred by telephone with Mr. Wilt on three separate occasions regarding Applicants' objections and requests for clarification. On or about December 10, 1981, Jay E. Silberg conferred with Mr. Wilt regarding Applicants' objections. Specifically, Mr. Silberg explained that Applicants understood Issue #1 to be limited to off-site emergency evacuation plans, and that Applicants would object to the Issue #1 Interrogatories requesting information not relevant to such plans. Mr. Silberg identified each Interrogatory to which Applicants would object on such basis, and explained why Applicants did not believe the Interrogatory to be within the scope of the Issue. Mr. Silberg and Mr. Wilt were unable to agree on the scope of Issue #1. Mr. Silberg also informed Mr. Wilt that Applicants would object to the Interrogatories regarding the 50 mile ingestion exposure EPZ as not being within the scope of the Issue.

On or about December 30, 1981, Mr. Silberg and Robert L. Willmore, conferred by telephone with Mr. Wilt a second time regarding the Interrogatories. Mr. Silberg reviewed Applicants' objections to the Interrogatories beyond the scope of Issue #1. Mr. Silberg also explained that Applicants would object to those Issue #3 Interrogatories not related to the February, 1978, NRC Immediate Action Letter (see response to Interrogatories #47 and #48). Mr. Silberg further informed

Mr. Wilt that Applicants would object to those Issue #6 Interrogatories requesting information not related to whether Applicants should install an automated Standby Liquid Control System ("SLCS"). In this regard, Mr. Silberg requested clarification of a number of Interrogatories, both as to substance and as to relevancy. Mr. Wilt was able to clarify some of the Interrogatories, but as to several, told Mr. Silberg that he could provide clarification only after conferring with his researchers. Such clarifications have not been provided.

On or about January 28, 1982, Mr. Willmore conferred by telephone with Mr. Wilt. Mr. Willmore reiterated Applicants' position on the relevancy of many of the Interrogatories. Mr. Willmore once again informed Mr. Wilt that Applicants needed clarification of certain Interrogatories. Specifically, Mr. Willmore explained that many Issue #6 Interrogatories appear to have no relevancy to whether Applicants should install an automated SLCS, and that Applicants would object to those Interrogatories without some explanation of their relevancy. Mr. Willmore offered to explain again in detail any of Applicants' objections and requests for clarification. Mr. Wilt did not indicate any desire for further explanation.

ISSUE #1

1. Demonstrate (pursuant to 10 C.F.R. §50.33(g) and 10 C.F.R. §50.47 (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.

Response:

The considerations taken into account in establishing the plume exposure pathway EPZ for Perry Nuclear Power Plant are described in FSAR Appendix 13A, Appendix D, Section II. The plume exposure pathway initially was defined by Alan N. Voorhees and Associates in the Evacuation Time Estimate Study of July, 1980 (Final Report, Appendix 13A, Appendix D). The EPZ may be modified during county plan development. A legible map will be provided.

Applicants object to the part of the Interrogatory concerning the ingestion exposure EPZ as irrelevant and beyond the scope of Issue #1. See response to Interrogatories #12 and #18.

2. NUREG-0654, 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 off-site public protective actions. In addition, fully explain how off-site radiological emergency response plans for Perry take into account the parameters of the duration of release.

Response:

The control room operators are not expected to determine the duration of a release at the outset of an emergency. The Emergency Action Levels which trigger various emergency classifications by the operators are based on actual equipment indicators, not on the time estimates of release. See FSAR Appendix 13A, Table 4-1 (Summary of Emergency Action Levels). Because the county emergency response plans have not yet been developed (see response to Interrogatory #3), Applicants cannot specify whether and how the plans may account for duration of release.

3. NUREG-0654, 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.

Response:

The off-site emergency response plans for Ashtabula, Geauga and Lake Counties are under development at this time. They are being prepared for each county by Alan N. Voorhees and Associates ("Voorhees"). Voorhees is coordinating with the State government to ensure that the county plans are in concert

with the State of Ohio Nuclear Power Plant Emergency Response Plan (December, 1980) ("the State Plan").

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).

Response:

As required by NUREG-0654, Applicants have made arrangements for RAP/IRAP assistance, as documented in FSAR Appendix 13A, Section 5.6.6 and in Appendix B to Appendix 13A. Applicants do not at this time have the necessary information to describe each capability in detail or provide any time estimates for response implementation.

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.

Response:

NUREG-0654 planning standards and criteria are addressed in the Perry Nuclear Power Plant Site Emergency Plan, as documented in FSAR Appendix 13A, Appendix F. (Appendix F contains cross-references to applicable NUREG-0654 criteria. A

similar cross-reference is contained in the State Plan, pages VI-1 - VI-15.) County plans are currently under development (see response to Interrogatory #3). The State Plan has been tested twice and favorably evaluated by the Federal Emergency Management Agency within the requirements of NUREG-0654. The adequacy of the county and State Plans will be demonstrated in a full emergency preparedness exercise, as required by 10 C.F.R. Part 50, Appendix E, IV.F.1.b.

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 on-site 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 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.

Response:

Copies of all letters of agreement concerning off-site emergency response appear in FSAR Appendix 13A, Appendix B. A copy of a letter of agreement with Lake County, in which

Applicants provide Lake County with funds that may be used for off-site emergency response, is supplied herewith. To the extent that the Interrogatory assumes that Applicants have or need letters of agreement with all governmental agencies responding to an emergency, such letters of agreement are not needed for those agency emergency evacuation functions and tasks that are the legal responsibilities of the responding agencies. The functions and tasks of the responding agencies are described in FSAR Appendix 13A, Section 5.6 (Coordination With Participating Governmental Agencies), and will be described in greater detail in the county plans presently under development. The response of the involved State agencies is described in detail in the State Plan.

Applicants object to the parts of the Interrogatory beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1) (Discovery shall relate only to those matters in controversy identified in prehearing order). The parts of the Interrogatory directed at Applicants' on-site agreements, including agreements with Applicants' contractors, are not within the scope of Issue #1, as delineated by the Licensing Board in its orders of July 28, 1981, and September 9, 1981. Any agreements by Applicants to assume the costs of emergency planning improvements are also irrelevant and beyond the scope of the Issue.

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 mainstay 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 off-site 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 of-site/on-site 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).

Response:

A. Applicants have no basis for agreeing or disagreeing with the cited statement because Applicants do not know what its authors intended by the phrases "extended periods" and

"prolonged . . . period." However, Applicants are aware of no evidence that emergency workers, including volunteers, will not stay and perform their jobs during a nuclear emergency. See "Partial Initial Decision," in Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1), ¶¶ 1420 - 1428 (December 14, 1981).

B. Applicants do not intend to rely on volunteers for any emergency evacuation functions. Nor do Applicants intend to rely on volunteers to communicate evacuation recommendations or to collect data necessary to make such recommendations. To the extent that the Interrogatory is directed at county use of volunteers, the county plans still are under development.

C. Applicants object to the part of the Interrogatory directed at on-site emergency plans, such plans being outside of the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). As for the relevant part of the Interrogatory, see response to part B above.

D. See response to part B above.

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).

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). Applicants' on-site emergency plans are not within the scope of the Issue. See orders of July 28, 1981, and September 9, 1981.

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See response to Interrogatory #8.

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.

Response:

Section II, Part D of the State Plan describes the procedures to be used for rapid notification of the general public. The notification procedures to be used by the affected counties are presently under development. See response to Interrogatory #3. See Interrogatory #11 for information and documentation regarding the siren systems.

11. Pursuant to Criterion II.E.6 of NUREG-0654, Rev. 1, page 45, and 10 C.F.R. 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. [sic] 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.

Response:

Applicants are developing a prompt alert and notification system ("PAS") design which will meet the guidelines of NUREG-0654, Appendix 3. Applicants have hired a consultant to make an acoustical study, the results of which will be a PAS design recommendation. Effectiveness of the PAS will be demonstrated in a test of the system to be held prior to receipt of a full power license. Documents pertaining to the PAS can be examined at Perry Nuclear Power Plant during normal working hours by contacting Rebecca Coffey of The Cleveland Electric Illuminating Company at 216-259-3737.

Applicants have contractual responsibility for maintenance of the siren system, though the exact involvement of the affected counties, particularly as to testing of the system, has not yet been determined. The affected counties will have

the authority to activate the system. The conditions under which they will exercise that authority have not yet been determined. See response to Interrogatory #3. Applicants object to the part of the Interrogatory directed at Applicants' financial qualifications, such considerations not being within the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

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.

Response:

No public education and information program for the Plume Exposure Pathway EPZ as yet has been developed or disseminated to the public. Nor have Applicants hired consultants to do so. The relevant plans of the State of Ohio can be found in the State Plan, Section II, Parts D, E, and F.

Applicants object to the portion of the Interrogatory directed at the Ingestion Exposure Pathway EPZ, such being beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). The functions of the Technical Support Center are to provide on-site operational assessment and on-site command and control in case of an emergency. See description at FSAR Appendix 13A, Section 7.1.1. The workings of the Center thus are not within the scope of the Issue. See orders of July 28, 1981, and September 9, 1981.

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, icing.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). The Interrogatory is not directed at off-site emergency evacuation plans, and, therefore, is not within the scope of the Issue.

15. Fully describe any dose projection system intended to be used by the Applicant and/or off-site 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 off-site doses under the following conditions: a heated release, releases involving large quantities of radioiodines and/or particulates, and drifting wind patterns, and any combination of these factors.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See response to Interrogatory #14. (To the extent that the Interrogatory is directed at the State and county dose projection plans, Applicants are not aware that any such plans have been developed.)

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.

Response:

Applicants' provisions with Lake County Memorial Hospital East are concerned with on-site injuries only, and, therefore, have no relation to off-site emergency evacuation plans. See FSAR Appendix 13A, Sections 5.5 and 6.5. Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

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.

Response:

The number of employees on-site once Units I and II go into operation will be approximately 500 during normal daytime working hours, and approximately 50 at all other times.

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). Emergency evacuation plans do not exist and are not required for the 50 mile plume ingestion EPZ, and any discovery directed at such EPZ, therefore, is beyond the scope of the Issue. See response to Interrogatory #12.

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 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.

Response:

Applicants object to the Interrogatory to the extent it requests information beyond the scope of Issue #1. See response to Interrogatory #6. As to existing agreements within

the scope of the Issue, see response to Interrogatory #6. As to future agreements within the scope of the Issue, Applicants are still in the process of determining what other letter agreements may be necessary.

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.

Response:

"Primary Working Document" refers to those sets of procedures that will be used to implement the provisions of the Perry Emergency Plan. The specific procedures within the scope of Issue #1 have not yet been developed.

21. Does Applicant have a security plan and procedures and a Health Physics instructions? [sic]

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

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.

Response:

The parameters, boundaries, and criteria for each Emergency Action Level can be found in FSAR, Appendix 13A, Table 4-1. Applicants' guidelines also are contained in Table 4-1. The specific procedures to be used by the Emergency Duty Officer have not yet been developed.

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?

Response:

Applicants' plans for ensuring the effectiveness of the Emergency Plan are discussed in FSAR, Appendix 13A, Section 8. The precise procedures which Applicants will use to update the Emergency Plan have not yet been developed.

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). The Interrogatory is not directed at emergency evacuation plans, and, therefore, is not within the scope of the Issue.

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

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?

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

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.

Response:

To the extent that the Interrogatory requests information regarding on-site emergency responses, Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1.

See 10 C.F.R. § 2.740(b)(1). Applicants anticipate that the county plans under development will address the training and experience to be provided off-site organizations responsible for any off-site emergency response. Procedures, training manuals, instruction schedules, etc., for such organizations have not yet been developed. The State of Ohio provides Radiological Emergency Response Training, as described in the State Plan, Section II, Part N.

28. What facilities are available, not proposed, to transport members of the public or Perry Nuclear Power Plant staff to Radiation Medical [sic] Center Hospital, in Philadelphia, Pennsylvania?

Response:

Applicants do not intend to transport members of the public to Radiation Medicine Center Hospital in Philadelphia, Pennsylvania. See FSAR Appendix 13A, Sections 5.5 and 6.5. To the extent that the Interrogatory requests information regarding the treatment of plant personnel, Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

29. Set forth in detail the emergency medical plan adopted by Applicant.

Response:

In that Applicants' emergency medical plan applies only to on-site injuries, Applicants object to the Interrogatory as

irrelevant and beyond the scope of Issue #1. See response to Interrogatory #28.

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.

Response:

There are currently no agreements between Applicants and any off-site organizations regarding the specified services beyond those agreements identified in the May, 1981, Emergency Plan. Applicants object to the Interrogatory to the extent that it is directed at any on-site emergency response. See response to Interrogatory #27.

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See response to Interrogatory #33.

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?

Response:

Applicants have not entered into any such letters of agreement with the referenced agencies. As stated in response to Interrogatory #6, such letters of agreement are not necessary where the responding governmental agencies are fulfilling their legal obligations. As for training of any county agencies, the county emergency plans are under development. See response to Interrogatory #3. Radiological Emergency Response Training for State and local agencies is set forth in the State Plan, Section II, Part N. Assurance of the State of Ohio's cooperation can be found in the Governor's Implementing Directive contained in the State Plan, page i. Further assurance of the emergency evacuation plans will be demonstrated in the emergency preparedness exercises to be conducted pursuant to 10 C.F.R. Part 50. See response to Interrogatory #5.

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?

Response:

Applicant's arrangements with Radiation Management Corporation relate only to injuries occurring on-site, and, therefore, are not part of off-site emergency evacuation plans. See FSAR Appendix 13A, Sections 5.5 and 6.5. Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. §2.740(b)(1).

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See responses to Interrogatories #12 and #18.

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.

Response:

The maximum exposure level for off-site emergency workers is contained in the State Plan, Section II, Part I. As for the training of such off-site emergency workers, see response to Interrogatory #27.

36. When will the Emergency Operations Facility be planned and implemental [sic]? Where will it be located? How will it have access to data displays and information readouts from the control room?

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See response to Interrogatory #13.

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

Response:

Applicants and Lake County have entered into an agreement in which Applicants provide Lake County with funds, part of which may be used for a County Emergency Operations Center. See response to Interrogatory #6.

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

Response:

The "comprehensive communications network with backup capabilities" will be operational before issuance of an operating license.

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

Response:

The "emergency organization notification system" will be installed before issuance of an operating license.

40. How is the emergency communications system powered?

Response:

The Plant Communication System, as described in FSAR Section 9.5.2, will be used as the emergency communication system upon the occurrence of an emergency. The power supply to be used for the emergency communication system for plant and off-site communications is described in FSAR, Section 9.5.2.2 (describing Plant Communication System).

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1). The Interrogatory is not directed at off-site emergency evacuation plans, and, therefore, is not within the scope of the issue.

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

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #1. See 10 C.F.R. § 2.740(b)(1).

ISSUE #3

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.

Response:

The specific items of noncompliance, including the specific NRC requirements which resulted in the NRC Immediate Action Letter of February 8, 1978, are documented in Appendix A (Notice of Violation) to the July 13, 1978, NRC letter from James G. Keppler to R. M. Ginn. A copy of the letter and Appendix is attached herewith. The areas of construction in which major quality assurance deficiencies were found are identified in the first paragraph of the aforementioned July 13, 1978, letter.

The "weaknesses" in Applicants' Quality Assurance Program that were identified by the NRC Immediate Action Letter, are identified and discussed in Items 6, 7 and 8 of that letter (dated February 8, 1978, and supplied herewith). The results of the evaluation required by Items 7 and 8 of the NRC

Immediate Action Letter are documented in three letters from Dalwyn R. Davidson to James G. Keppler of May 1, 1978, August 8, 1978, and September 14, 1978. Copies of the letters are supplied herewith.

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.

Response:

The information requested by the Interrogatory can be found in NRC inspection reports and Applicants' responses since February, 1978. Applicants will make available for examination copies of all NRC inspection reports and Applicants' responses. The documents can be examined at Perry Nuclear Power Plant during normal working hours by contacting Rebecca Coffey of The Cleveland Electric Illuminating Company at 216-259-3737.

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.

Response:

Applicants are unable to specify in detail the results of the NRC's augmented inspection program. The NRC does not identify which of its inspections or portions of inspections are part of its augmented inspection program and which are part of its originally scheduled inspection modules. Because Applicants are unable to identify the inspections or portions of inspections conducted pursuant to the NRC's augmented inspection program, Applicants cannot determine what violations were discovered by those inspections.

46. Define the term "critical blueprints".

Response:

Applicants are not acquainted with the source of the term "critical blueprints".

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

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #3. See 10 C.F.R. § 2.740(b)(1).

Torquing of cable tray bolts was not a consideration leading to the February, 1978, NRC Immediate Action Letter.

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

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #3. See 10 C.F.R. § 2.740(b)(1). The Unit 1 containment building dome was placed on May 2, 1981, and therefore, is irrelevant to the February, 1978, NRC Immediate Action Letter.

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?

Response:

The engineering specifications and judgments used by Applicants in establishing the Quality Assurance Program can be found in PSAR Chapters 17.0 (Quality Assurance) and 17.1 (Quality Assurance During Design And Construction). The February, 1978, NRC Immediate Action Letter disclosed no deficiencies in the engineering judgments set forth in PSAR Chapters 17.0 and 17.1.

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.

Response:

The changes made in Applicants' Quality Assurance Program as a result of the February, 1978, NRC Immediate Action Letter are described in general terms in the aforementioned letters from Davidson to Keppler of May 1, 1978, August 8, 1978, and September 14, 1978. See response to Interrogatory #43. The changes are described in greater detail in NRC inspection reports and Applicants' responses from February, 1978, through mid 1979. The inspection reports and responses are available for examination. See response to Interrogatory #44. The reason the changes were not originally part of Applicants' Quality Assurance Program was because the need for the changes only became apparent after implementation of the Program.

ISSUE #4

51. Section 1.5.1.2. of PSAR 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 (PSAR, 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, LPCS, 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.

Response:

- (A) The 30° Steam Sector Methodology Confirmation Tests were performed in 1979.
- (B) To confirm the BWR/6 core spray model methodology, tests were performed at the General Electric Steam Sector Test Facility at Lynn, Massachusetts. Spray performance for the Tests was predicted using the General Electric methodology, and the results were compared with actual test data obtained at the Lynn Facility under typical BWR/6 reactor steam conditions. The applicability of the methodology and the Methodology Confirmation Tests to the BWR/6 has been recognized by the NRC, as documented by an NRC letter of February 3, 1978, from Darrell G. Eisenhut and Denwood F. Ross to G. G. Sherwood (copy

of letter supplied herewith). The Methodology Confirmation Tests are described in detail in General Electric Document NEDO-24712 ("Core Spray Design Methodology Confirmation Tests," August, 1979), supplied herewith. The NRC has reviewed and approved NEDO-24712. As documented by an NRC letter of January 30, 1981, from Robert L. Tedesco to G. G. Sherwood (copy of letter supplied herewith), the Tests confirm the model methodology for the BWR/6 type core spray sparger.

- (C) The 30° Steam Sector Methodology Confirmation Tests are described in detail in General Electric Document NEDO-24712. The conditions and parameters of the Tests also are described in the aforementioned February 3, 1978, NRC letter from Eisenhut and Ross to Sherwood. Only the High-Pressure Core Spray and the Low-Pressure Core Spray systems were examined in the Tests. Since the Automatic Depressurization System and the Low-Pressure Core Injection System do not involve any injection through the spargers, they are not examined in the Tests. Because the Tests

were performed on a model, the diesel generators powering the system were not tested concurrently. No specific ECCS failure modes were assumed. The simulation of operating core accident conditions and the test procedures can be found in General Electric Document NEDO-24712.

- (D) The 30° Steam Sector Methodology Confirmation Tests will not be performed on a fueled and operating reactor. See response to part (B) above.

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.

Response:

The source of the cited quotations (the first of which is not accurately quoted in the Interrogatory) is the aforementioned February 3, 1978, NRC letter from Eisenhut and Ross to Sherwood.

53. Why is experimental data missing on the safety of Applicants' ECCS?

Response:

No experimental data relevant to Issue #4 is missing.

54. Specify the name and address of the person or organizations who will perform the full scale 30 degree sector steam test.

Response:

The name and address of the person or organization which performed the 30° Steam Sector Methodology Confirmation Tests can be found in General Electric Document NEDO-24712.

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?

Response:

See response to Interrogatory #51(B). The Perry Nuclear Power Plant does not contain a "prototype ECCS," a "prototype BWR/6 reactor," or a "prototype Mark III containment."

ISSUE #6

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?

Response:

The operators at the control room will discover an ATWS event within seconds of its occurrence.

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

Response:

Borated water will be pumped into the reactor approximately one minute after the operators activate the SLCS by turning the SLCS switch.

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

Response:

The reactor is "brought under control" within seconds of the occurrence of an ATWS event. Borated water is pumped into the reactor over a period of several minutes to complete the reactor shut-down.

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?

Response:

Immediately upon the occurrence of an ATWS event, the continuous monitoring equipment will indicate that reactor normal operating parameters have been exceeded. The SLCS is activated approximately two minutes after the monitoring equipment indicates that operating parameters have been exceeded. Borated water will be pumped into the reactor approximately one minute after the SLCS is activated. The

reactor is "brought under control" within seconds of the occurrence of an ATWS event. Borated water is pumped into the reactor over a period of several minutes to complete the reactor shut-down.

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

Response:

For those ATWS events necessitating activation of the SLCS, the SLCS should be activated upon determination that such an ATWS event has occurred.

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

Response:

The probability of an ATWS event occurring in the type of reactor being installed in the Perry Nuclear Power Plant is less than 5×10^{-6} per reactor year.

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

Response:

The probability of a common mode failure ATWS event has not been computed. But in that a common mode failure ATWS event is a subset of all ATWS events, the probability of a common mode failure ATWS event occurring in the type of reactor

being installed in the Perry Nuclear Power Plant is less than 5×10^{-6} per reactor year.

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.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). The Issue is not concerned with the effects of an unmitigated ATWS, but with whether Applicants should install an automated SLCS.

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

Response:

Applicants' object to the interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). Pellet-clad interaction failure is not relevant to the occurrence of an ATWS event, and, therefore, has no bearing on whether Applicants should install an automated SLCS.

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?

Response:

The probability of the occurrence of an ATWS event which can lead to core melt-down is substantially less than 5×10^{-6} per reactor year with either a manual or an automated SLCS. The probabilities of the occurrence of such an event with either a manual SLCS or an automated SLCS would be nearly identical.

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?

Response:

See response to Interrogatories #56 through #59.

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.

Response:

Applicants object to the part of the Interrogatory beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). Only those aspects of Alternative 4A relating to the automated SLCS are within the scope of the Issue.

To the extent that the Interrogatory requests clarification of why the SLCS to be installed in the Perry Nuclear Power Plant is to be manual rather than automated, it is the position of Applicants and General Electric that both the manual and

automated SLCS's provide substantially similar protection. The manual SLCS has been selected because of its greater cost effectiveness and because it is less likely to introduce borated water into the reactor unnecessarily.

68. Is it not true that Alternate 4(a) (of NUREG-0460) reduce [sic] 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.

Response:

See response to Interrogatory #67.

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.

Response:

For the case of the ATWS event generating the highest heat rejection to the suppression pool, the temperature of the pool will be less than 180° fahrenheit. That temperature is within the design parameters of the Mark III containment. The ability of the suppression pool to absorb core heat is unaffected by the installation of an automated SLCS.

70. Demonstrate the ability of the High Pressure coolant injection system to keep the core covered following an ATWS.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). The operation of the coolant injection system is not within the scope of the Issue.

71. What mechanisms are available at Perry Nuclear Power Plant to reduce the power oscillations in the BWR that would occur after at ATWS?

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1).

72. What mechanisms are available at Perry Nuclear Power Plant to reduce dilution of the foam [sic] injected by the SLCS.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). No foam is injected by the SLCS.

73. Submit off-site radiation dose estimates for the worst case transients based on G.E. code OLYN.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). See response to Interrogatory #63.

74. What training or procedures are available to plant operators in the event of an ATWS?

Response:

The ATWS training and emergency operating procedures have not yet been developed.

75. Describe the mechanisms available at Perry Nuclear Power Plant to avoid a pressure regulator failure ATWS.

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). Pressure regulator failure ATWS is not within the scope of the Issue.

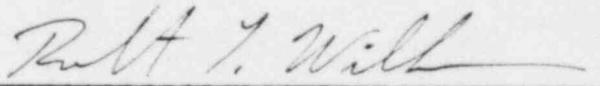
76. Describe the mechanisms available at Perry Nuclear Power Plant to avoid transition backing [sic].

Response:

Applicants object to the Interrogatory as irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1). Transition boiling is not within the scope of the Issue.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: 
Jay E. Silberg
Robert L. Willmore

Counsel for Applicants
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

DATED: February 5, 1982.

APPENDIX

(Documents Herewith Supplied To Sunflower Alliance, Inc.)

1. Letter Agreement between Applicants and Lake County.
2. Letter of July 13, 1978, from James G. Keppler to R. M. Ginn.
3. Letter of February 8, 1978, from James G. Keppler to Dalwyn R. Davidson ("NRC Immediate Action Letter").
4. Letter of May 1, 1978, from Dalwyn R. Davidson to James G. Keppler.
5. Letter of August 8, 1978, from Dalwyn R. Davidson to James G. Keppler.
6. Letter of September 14, 1978, from Dalwyn R. Davidson to James G. Keppler.
7. Letter of February 3, 1978, from Darrell G. Eisenhut and Denwood F. Ross to G. G. Sherwood.
8. General Electric Document NEDO-24712.
9. Letter of January 30, 1981, from Robert L. Tedesco to G. G. Sherwood.

CLEVELAND ELECTRIC ILLUMINATING COMPANY
CLEVELAND, OHIO

John J. Waldron, being duly sworn according to
name
law, deposes and says that he is Manager, Perry Plant
job title
of The Illuminating Company and that the
company
facts set forth in the foregoing Applicants' Answers to
Sunflower Alliance Interrogatories 1-42 dated December
2, 1981, are true and correct to the best of his knowledge,
information and belief.

John J. Waldron

Sworn to and subscribed
before me this 1st day
of February, 1982

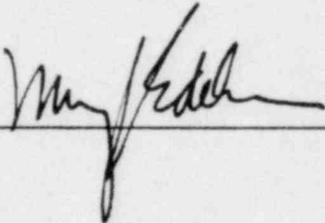
Caroline M. Wilde

CAROLINE M. WILDE
Notary Public, State of Ohio
My Commission Expires April 17, 1985
(Recorded in Lake County)

CLEVELAND ELECTRIC ILLUMINATING COMPANY

CLEVELAND, OHIO

Murray R. Edelman, being duly sworn according to
name
law, deposes and says that he is Manager, Nuclear Engineering Department
job title
of Cleveland Electric Illuminating Co. and that the
company
facts set forth in the foregoing Applicants' Answers to
Sunflower Alliance Interrogatories 43-50 dated December
2, 1981, are true and correct to the best of his knowledge,
information and belief.



Sworn to and subscribed

before me this 1st day
of February, 1982

Caroline M. Wilde

CAROLINE M. WILDE
Notary Public, State of Ohio
My Commission Expires April 17, 1985
(Recorded in Lake County)

STATE OF CALIFORNIA)
 :
COUNTY OF SANTA CLARA)

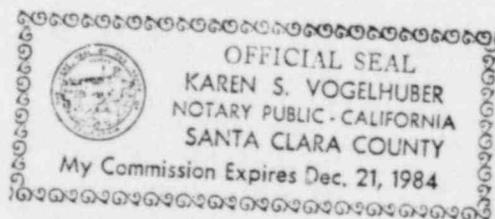
AFFIDAVIT

RICHARD A. HILL, being duly sworn according to law, deposes and says that he is Manager, Systems Evaluation Programs of General Electric Company and that the facts set forth in the foregoing Applicants' Answers to Sunflower Alliance Interrogatories should be identified with Questions 51, 52, 53, 54, 55, (Issue #4), dated February 3, 1982, are true and correct to the best of his knowledge, information and belief.

Richard A Hill

Sworn to and subscribed
before me this 3rd day
of February, 1982.

Karen S. Vogelhuber



STATE OF CALIFORNIA)
 :
COUNTY OF SANTA CLARA)

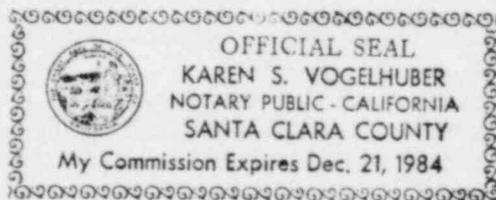
AFFIDAVIT

WILLIAM L. FIOCK, being duly sworn according to law, deposes and says that he is Manager, ATWS Program of General Electric Company and that the facts set forth in the foregoing Applicants' Answers to Sunflower Alliance Interrogatories should be identified with Questions 56, 57, 58, 59, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, — 75, 76 (Issue #6), dated February 3, 1982, are true and correct to the best of his knowledge, information and belief.

William L. Fiock

Sworn to and subscribed
before me this 3rd day
of February, 1982.

Karen S. Vogelhuber
Notary Public, State of California



CLEVELAND ELECTRIC ILLUMINATING COMPANY

CLEVELAND, OHIO

Larry O. Beck, being duly sworn according to
name
law, deposes and says that he is General Supervising Engineer, Licensing
job title
of Cleveland Electric Illuminating Co. and that the
company
facts set forth in the foregoing Applicants' Answers to
Sunflower Alliance Interrogatories 60, 74 dated December
2, 1981, are true and correct to the best of his knowledge,
information and belief.

L O Beck

Sworn to and subscribed

before me this 4th day

of FEBRUARY, 1982

Joseph C. Szwejkowski

JOSEPH C. SZWEJKOWSKI
Notary Public, State of Ohio - Cuya. Cty
My Commission Expires July 14, 1986

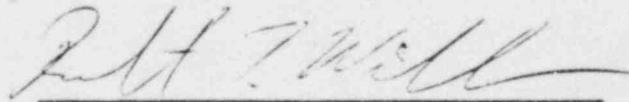
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY, ET AL.) Docket Nos. 50-440
) 50-441
(Perry Nuclear Power Plant,)
Units 1 and 2))

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing
"Applicants' Answers To Sunflower Alliance, Inc. First
Round Discovery Requests", were served by deposit in the
U. S. Mail, First Class, postage prepaid, this 5th day of
February 1982, to all those on the attached Service List.



Robert L. Willmore

Dated: February 5, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

SERVICE LIST

Peter B. Bloch, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James H. Thessin, Esquire
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Daniel D. Wilt, Esquire
Wegman, Hessler & Vanderburg
Suite 102
7301 Chippewa Road
Brecksville, Ohio 44141

Terry Lodge, Esquire
915 Spitzer Building
Toledo, Ohio 43604

Mr. Tod J. Kenney
228 South College, Apt. A
Bowling Green, Ohio 43402

Donald T. Ezzone, Esquire
Assistant Prosecuting Attorney
Lake County Administration Center
105 Center Street
Painesville, Ohio 44077

John G. Cardinal, Esquire
Prosecuting Attorney
Ashtabula County Courthouse
Jefferson, Ohio 44047