

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
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BRANCH

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

SUNFLOWER ALLIANCE ET. AL. RESPONSE TO NRC STAFF RESPONSE TO
MOTION FOR LEAVE TO SUBMIT ADDITIONAL CONTENTION.

Although the NRC staff has conceded reasonable specificity in Sunflower's contention, there is a question of timeliness. The specific responses to objections are listed below.

i). Good cause; in light of new information which was not yet available to the public at filing time, and which is not yet complete, the Savannah River Plant study of low-level radiation contamination of the surrounding land areas to 100 km. and incidence of death and disease among the population in those areas. The study by Alice Stewart (British Journal of Epidemiology and Community Health) of the low level radiation effects on Japanese A-bomb survivors, also not available at filing time.

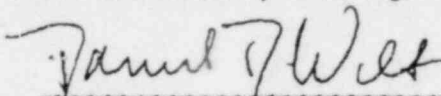
ii). There are no other means whereby petitioner's interest will be protected. A complete and sound record demands a full public airing of Sunflower's concerns and the issues involved. These are so complex and technical that a full discussion in the popular public media is precluded.

iii). Petitioners participation will definitely aid in developing a sound record because of some of the expertise available to Sunflower - ie. agricultural, medical, pysiological; who's testimony would perhaps not be made available without petitioners participation.

Further Sunflower's contention is based in part on the pact that doses calculations for Perry are not Perry specific and do not include new information regarding health hazards recently made public (Savahhah River Plant Study). And ignore conclusions by Sternglass, Hover and others about the general inadequacies of using computer models to estimate doses rather than using actual measurements.

Environmental radionuclide contamination & resulting health effects are potentially the most costly effect of a nuclear reactor under "normal" operating conditions. The value (positive & negative) of locally grown, produced and consumed food crops on the health of the people consuming them must be calculated and accounted for.

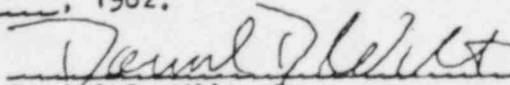
Therefore for the above reasons and those stated in the original motion for leave to submit new contention, Sunflower Alliance et. al. pray the Board to admit same contentions before the full evidentiary hearing.



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

S E R V I C E

A copy of this Response has been sent to all persons on the Service List on this 30 day of August, 1982.



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