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Washington, D.C. 20555

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

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

Re: Cleveland Electric Illuminating Co. et al (Perry Nuclear
Power Plant, Units 1 and 2) Docket Nos. 50-440-OL and
50-441-OL

Dear Judges:

During the August 13th conference call, the Licensing Board asked for recommendations for a hearing date. This letter presents Sunflower's recommendations as to a hearing date schedule.

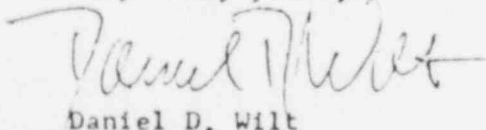
Discovery on certain issues is to close September 30, 1982 and on other issues on October 15, 1982. The history of this case discloses that it takes Staff and Applicant two to three months at a minimum to respond to discovery requests. Add to that the inevitable Motion to Compel and it will probably be 4½ months after October 15, 1982 before discovery is truly completed. This would be approximately February 28, 1982. Intervenors are entitled to discovery and are entitled to the fruits of discovery prior to hearings.

Sunflower is also entitled to file a Motion to show that a genuine issue of fact exists in terms of the Quality Assurance contention. This cannot be done until discovery is complete. I suggest that this Motion be filed by March 21, 1982.

Thus, Sunflower suggests that the initial hearing date commence on May 1, 1983. Motions for Summary Disposition should be filed not later than April 15, 1983. A special pre-hearing conference should be held on April 22, 1983 to go over any unanticipated events or problems.

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Very truly yours,



Daniel D. Wilt

CC: Service List

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