UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
CLEVELAND ELECTRIC ILLUMINATING COMPANY, et al.	)	Docket Nos. 50-440 50-441 (OL)
	)	
(Perry Nuclear Power Plant, Units 1 and 2)	)	October 29,,1982

RESPONSE OF SUNFLOWER ALLIANCE, INC., et al., TO APPLICANT'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS (THIRD SET)

Intervenor Sunflower Alliance, Inc., et al. herewith supplies its answers to Applicant's Third Set of Interrogatories and Request for Production of Documents, dated September 30, 1982. Sunflower Alliance, Inc. is at this time responding to only those interrogatories pertaining to Issues No. 1 and No. 3. Sunflower will defer answering those interrogatories and requests for production of documents concerning Issue No. 11 until a later date. Sunflower Alliance, Inc. will not repeat here the interrogatories directed to Sunflower; the answers to said interrogatories are provided below.

Issue No. 1

1. (a) Sunflower Alliance, Inc. has examined certain draft emergency response plans for Lake and Ashtabula Counties.

(b) (1) All portions of the draft plan for Ashtabula County; all portions of the working draft plan for Lake County.

(2) Sunflower Alliance, Inc. objects to this subpart

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of Interrogatory 1 as irrelevant to Issue No. 1 and therefore beyond the scope of discovery.

(3) The Ashtabula County plans were examined by:

James McIntyre
P.O. Box 91
Jefferson, OH 44047

Stephen Sass
1104 East 15th St.
Ashtabula, OH 44004

The Lake County plans were examined by:

Amy Hubbard
3901 Bridge Ave.
Cleveland, OH 44113

Sunflower Alliance, Inc. considers the portion of this interrogatory pertaining to the employers of these persons to be objectionable, as such information is irrelevant to Issue No. 1.

(4) Sunflower Alliance, Inc. objects to this supbart of Interrogatory 1 as irrelevant to Issue No. 1 and therefore beyond the scope of discovery.

2. (a) Sunflower Alliance, Inc. does possess copies of the draft plans identified in the response to Interrogatory 1. However, Sunflower objects to having to produce said copies, as these documents are readily available to Applicant and the production of same would place an undue burden on Intervenor's limited resources.

(b) Sunflower Alliance, Inc. objects to this subpart of Interrogatory 2 as irrelevant to Issue No. 1 and therefore beyond the scope of discovery.

3. (a) and (b) Sunflower Alliance, Inc. objects to this Interrogatory as irrelevant to Issue No. 1 and therefore beyond the scope of discovery.

Issue No. 3

4. (a) and (b) Sunflower Alliance, Inc. objects to this Interrogatory as irrelevant to Issue No. 3 and therefore beyond the scope of discovery.

5. (a) through (e) Sunflower Alliance, Inc. does not have knowledge of any alleged deficiencies in construction or quality assurance at the Perry Nuclear Power Plant other than those identified in the NRC's inspection reports, Applicant's reports to the NRC, or accounts in the news media, as identified in Sunflower's previous filings.

Issue No. 11

Answers to Interrogatories 6 through 10 are deferred.

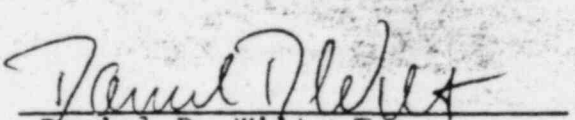
General Interrogatories

11. and 12. Answers to these interrogatories are provided by the attached affidavit.

13. and 14. No document search was conducted in order to respond to the Interrogatories pertaining to Issues No. 1 and No. 3.

15. Sunflower Alliance, Inc. does not possess or control any such written or recorded statements pertaining to Issues No. 1 or No. 3.

Repsectfully submitted,



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