

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

85 MAR -4 AM 11:36

In the Matter of )  
 )  
THE CLEVELAND ELECTRIC )  
ILLUMINATING COMPANY )  
 )  
(Perry Nuclear Power Plant, )  
Units 1 and 2) )  
 )

Docket Nos. 50-440 and 50-441

OFFICE OF SECRETARY  
DOCKETING & SERVICE

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SUNFLOWER'S STATEMENT OF MATERIAL FACTS  
(CONTENTION JJ)

Now comes Sunflower Alliance and sets forth the following facts in opposition to summary disposition of Contention JJ:

1. The Grand Valley School District in Ashtabula County has a policy of refueling school buses only when the tanks are 1/4 or less full. Affidavit of Barbara Niznik accompanying Sunflower's responses to summary disposition of Contention Q.
2. Niznik has not been instructed of her specific duties during an emergency at PNPP. Id.

Respectfully submitted,

By Terry J. Lodge

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Counsel for Sunflower  
Alliance

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NUCLEAR REGULATORY COMMISSION

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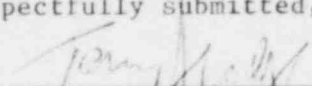
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SUNFLOWER'S CERTIFICATE OF SERVICE OF CERTAIN DOCUMENTS

I hereby certify that a copy of the following documents was served by me this 2nd day of March, 1985 by regular U.S. Mail, postage prepaid, upon the parties appearing on the attached "Service List", except that those parties having an asterisk (\*) by their names were served by express mail on this date. The documents are:

Sunflower's Memorandum in Opposition to Summary Disposition of Contention J;  
Sunflower's Statement of Material Facts (Contention J);  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention O;  
Sunflower's Statement of Material Facts (Contention O);  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention Q;  
Sunflower's Statement of Material Facts (Contention Q);  
Affidavit of Barbara Niznik on Contention Q;  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention U;  
Sunflower's Statement of Material Facts (Contention U);  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention Z;  
Sunflower's Statement of Material Facts (Contention Z);  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention BB;  
Sunflower's Statement of Material Facts (Contention BB);  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention CC;  
Sunflower's Statement of Material Facts (Contention CC);  
Sunflower's Memorandum in Opposition to Summary Disposition of Contention JJ;  
Sunflower's Statement of Material Facts (Contention JJ).

Respectfully submitted,

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