

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Board

85 FEB 25 P1:35

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

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Docket Nos. 50-440 and

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
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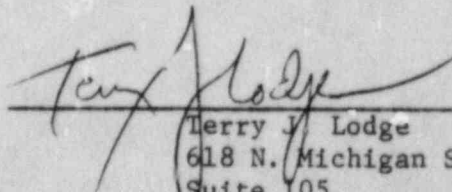
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SUNFLOWER'S STATEMENT OF MATERIAL FACTS  
(CONTENTION G)

Now comes Sunflower Alliance and sets forth the following as  
material and genuine fact issues on Contention G:

1. The 1980 administrative determination of the Ohio Department of Health is conditioned upon establishment of a federal policy. FEMA Interim Report, App. A.
2. In 1982, the U.S. Food and Drug Administration promulgated guidance for the use of potassium iodide among members of the general public in radiation emergencies. Affidavit of Phillip Schmidt at 3.
3. The condition precedent to Ohio adoption of KI as a thyroid blocking agent for exposed members of the public has now occurred. Affidavit of Phillip Schmidt at 3.

Respectfully submitted,

By   
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