

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

MISSOURI COALITION FOR  
THE ENVIRONMENT, INC.

Petitioner,

v.

UNITED STATES NUCLEAR  
REGULATORY COMMISSION and the  
UNITED STATES OF AMERICA,

Respondents.

Case No. 15-1114

**UNOPPOSED MOTION OF UNION ELECTRIC COMPANY,  
DBA AMEREN MISSOURI, FOR LEAVE TO INTERVENE**

Union Electric Company, dba Ameren Missouri (“Ameren”), respectfully moves, pursuant to 28 U.S.C. § 2348, Rule 15(d) of the Federal Rules of Appellate Procedure, and DC Circuit Rule 15(b), for intervention as of right in the above-captioned proceeding as a respondent in support of the agency decisions identified in the Petition for Review filed by the Missouri Coalition for the Environment (“Missouri Coalition”) in Case. No 15-1114.<sup>1</sup> In support of this motion, Ameren states the following:

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<sup>1</sup> Missouri Coalition Petition for Review, Missouri Coalition for the Environment v. United States Nuclear Regulation Commission, No. 15-1114 (Apr. 23, 2015).

Ameren holds the operating license issued by the Nuclear Regulatory Commission (“NRC”) for the Callaway Nuclear Power Plant, Unit 1 (“Callaway”), which is located in Callaway County, Missouri. Ameren is the licensed owner and operator of Callaway.

Ameren is entitled to intervene as a matter of right in this action because Ameren was a party in interest in the proceeding before the NRC that is the subject of the Petition for Review. In December 2011, Ameren applied to the NRC to renew the operating license of Callaway for an additional twenty year period. Ameren fully participated in the NRC license renewal proceeding for Callaway, in which the NRC ultimately granted Ameren’s application and on March 6, 2015, issued Renewed Facility Operating License No. NPF-30 for Callaway. That issuance and related orders are the subject of the instant Petition for Review.

The renewed NRC operating license for Callaway authorizes Ameren to continue to operate Callaway for twenty years beyond its initial operating license expiration date, which is October 18, 2024. Ameren derives financial benefit from the generation and sale of electricity from Callaway. The renewed operating license is necessary for Ameren to receive financial benefit from the continued operation of Callaway throughout the twenty year license renewal period, as well as other expected benefits. Therefore, Ameren’s interests would be adversely

affected if the NRC's issuance identified in the Petition for Review were enjoined, set aside, or suspended. 28 U.S.C. § 2348.

Thus, Ameren has substantial, direct, and tangible interests in this Court's affirmation of the NRC issuance and orders challenged by the Petition for Judicial Review. Accordingly, Ameren is entitled to intervene as of right in this action. 28 U.S.C. § 2348. Further, counsel for Ameren has been authorized by counsel for the Nuclear Regulatory Commission and counsel for the Missouri Coalition to represent that they do not oppose Ameren's intervention in this proceeding.

Respectfully submitted,

Dated: April 30, 2015

/s/ David R. Lewis  
David R. Lewis  
Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, N.W.  
Washington, DC 20036  
(202) 663-8474  
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,  
dba Ameren Missouri

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**ADDENDUM TO UNOPPOSED MOTION FOR LEAVE TO INTERVENE  
CERTIFICATE AS TO PARTIES, RULINGS, AND RELATED CASES**

Pursuant to D.C. Circuit Rule 27(a)(4), counsel for Union Electric Company,  
dba Ameren Missouri (“Ameren”), certifies as follows:

**1. Parties, Intervenors, and Amici.**

All parties, intervenors and amici appearing in this court are listed in the  
Petition for Review for Petitioner Missouri Coalition.

**2. Rulings Under Review.**

References to the rulings at issue appear in the Petition for Review for  
Petitioner Missouri Coalition.

### 3. Related Cases.

This case is related to State of New York v. NRC, Nos. 14-1210, 14-1212, 14-1216, and 14-1217 (Consolidated), which involves judicial review of the NRC's Continued Storage of Spent Nuclear Fuel Rule, 70 Fed. Reg. 56,238 (Sept. 19, 2014), and the NRC's Generic Environmental Impact Statement for the Continued Storage of Spent Nuclear Fuel, 70 Fed. Reg. 56,263 (Sept. 19, 2014).

Respectfully submitted,

Dated: April 30, 2015

/s/ David R. Lewis  
David R. Lewis  
Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, N.W.  
Washington, DC 20036  
(202) 663-8474  
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,  
dba Ameren Missouri

Union Electric Company, dba Ameren Missouri, is a Missouri corporation supplying electric and natural gas service to central and eastern Missouri. Union Electric Company owns and operates the Callaway Nuclear Power Plant, Unit 1.

Union Electric Company is a wholly owned subsidiary of Ameren Corporation. No other publicly held company has 10 percent or more equity interest in Union Electric Company.

Dated: April 30, 2015

/s/ David R. Lewis

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Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street N.W.  
Washington, DC 20036  
(202) 663-8474  
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,  
dba Ameren Missouri

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2015, the foregoing (1) Unopposed Motion of Union Electric Company, dba Ameren Missouri, for Leave to Intervene; (2) Certificate as to Parties, Rulings, and Cases; and (3) Corporate Disclosure Statement of Union Electric Company, dba Ameren Missouri; were served via the D.C. Circuit's Case Management/Electronic Case Files system. In addition, copies of the foregoing were also served by deposit in the U.S. mail, first class, postage prepaid, and by electronic mail, on the persons listed below, this 30th day of April, 2015.

Andrew Averbach, Solicitor  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Mail Stop O-15D21  
11555 Rockville Pike  
Rockville, MD 20852-2738  
Andrew.averbach@nrc.gov

Diane Curran  
Harmon, Curran, Spielberg, &  
Eisenberg, L.L.P.  
1726 M Street N.W., Suite 600  
Washington, D.C. 20036  
dcurran@harmoncurran.com

Michelle Dara Albert  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop O-15D21  
11555 Rockville Pike  
Rockville, MD 20852-2738  
Email: Michelle.Albert@nrc.gov

Mindy Goldstein  
Turner Environmental Law Clinic  
Emory Law School  
1301 Clifton Road  
Atlanta, GA 30322  
magolds@emory.edu



John E. Arbab  
Environmental & Natural Resources  
Division,  
Appellate Section  
United States Department of Justice  
Patrick Henry Building, Room 2121  
601 D Street, N.W.  
Washington, D.C. 20004  
john.arbab@usdoj.gov

Dated: April 30, 2015

/s/ David R. Lewis  
David R. Lewis  
Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street N.W.  
Washington, DC 20036  
(202) 663-8474  
david.lewis@pillsburylaw.com

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