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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKET

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
UNION ELECTRIC COMPANY ) Docket No. STN 50-483 OL  
 )  
(Callaway Plant, Unit 1) )

APPLICANT'S INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS  
TO INTERVENOR JOHN G. REED

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Applicant hereby requests that Intervenor John G. Reed answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below.

Applicant requests that the name and address of the person or persons who provide information used in answering each interrogatory be identified, and that the source of information be disclosed where an answer is based in whole or in part on information other than the personal knowledge of the person or persons answering.

These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or

amended as appropriate, should Mr. Reed or any individual acting on his behalf obtain any new or differing information responsive to these interrogatories.

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, transcript, report, handwritten notes, test data) and provide the following information as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which you rely.

Definitions. As used herein, the following definitions shall apply: "emergency response plans for the Callaway Plant" includes the Callaway Plant Radiological Emergency Response Plan and Appendices thereto (the "Callaway RERP"), the State of Missouri Nuclear Accident Plan, and the Callaway Offsite Emergency Response Plan; the "county Standard Operating Procedures" includes the Standard Operating Procedures for Callaway County/Fulton City, Osage County, Gasconade County and Montgomery County; "NUREG-0654" is Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, NUREG-0654, FEMA-REP-1, Rev. 1 (Oct. 1980).

INTERROGATORIES ON CONTENTION 1(a)<sup>1</sup>

1(a)-1. Identify those local organization/agencies which you contend lack sufficient staff to adequately respond in the event an emergency at the Callaway Plant.

1(a)-2. For each organization identified in the answer to the preceding interrogatory, state in detail all the facts which support your contention that such organizations are inadequately staffed.

1(a)-3. Identify all documents which support your contention that those organizations identified in the answer to Interrogatory 1(a)-1 are inadequately staffed.

1(a)-4. Identify all persons whom you expect to testify on your behalf in support of your contention that those organizations identified in the answer to Interrogatory 1(a)-1 are inadequately staffed.

1(a)-5. For each organization identified in the answer to Interrogatory 1(a)-1, state in detail:

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<sup>1</sup> Applicant's interrogatories are numbered in accord with the scheme adopted in Applicant's Response to Final Particularization of Reed's Contentions 1, 2 and 3. Under Contention No. 1, the first three paragraphs are not addressed, and the interrogatories go to paragraph 4 alone. Thus, Contention 1(a) appears at paragraph 4.a, on page 3 of the Petition.

- (a) the emergency response duties which you contend the organization would be incapable of performing due to inadequate staffing;
- (b) your estimate (and the basis therefor) of the additional staffing which you contend would be required in order to provide adequate emergency response capability for the Callaway Plant.

1(a)-6. Do you contend that those organizations identified in the answer to Interrogatory 1(a)-1 must be staffed on a continual (i.e., 24 hour per day) basis?

1(a)-7. If your answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that continual staffing is required.

1(a)-8. If your answer to Interrogatory 1(a)-6 is affirmative, identify all documents that support your contention that continual staffing is required.

1(a)-9. If your answer to Interrogatory 1(a)-6 is affirmative, identify all persons whom you expect to testify in support of your contention that continual staffing is required.

1(a)-10. Identify the "primary responsibilities" for emergency response actions required of local organizations

which you contend have not been assigned in the emergency response plans for the Callaway Plant.

1(a)-11. For each primary responsibility identified in the answer to the preceding interrogatory, state in detail all facts which support your contention that local organizations are charged with the duty to carry out such actions.

1(a)-12. For each primary responsibility identified in the answer to Interrogatory 1(a)-10, identify all documents which support your contention that local organizations are charged with the duty to carry out such actions.

1(a)-13. For each primary responsibility identified in the answer to Interrogatory 1(a)-10, identify all persons whom you expect to testify on your behalf in support of your contention that local organizations are charged with the duty to carry out such actions.

1(a)-14. Do you contend that letters of agreement are required between a local government agency and the local governing body before such an agency is responsible for carrying out those duties assigned to it in the emergency response plans for the Callaway Plant?

1(a)-15. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such letters of agreement are required.

1(a)-16. If the answer to Interrogatory 1(a)-14 is affirmative, identify all documents which support your contention that such letters of agreement are required.

1(a)-17. If the answer to Interrogatory 1(a)-14 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such letters of agreement are required.

1(a)-18. If the answer to Interrogatory 1(a)-14 is affirmative, do you take the same position with respect to emergency planning responsibilities in the event of a natural disaster? If not, describe in detail the bases for the difference in your positions.

1(a)-19. Do you contend that local government officials and/or employees must formally agree, in writing, to accept those responsibilities designated to them in the emergency response plans for the Callaway Plant?

1(a)-20. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such formal agreements are required.

1(a)-21. If the answer to Interrogatory 1(a)-19 is affirmative, identify all documents which support your contention that such formal agreements are required.

1(a)-22. If the answer to Interrogatory 1(a)-19 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such formal agreements are required.

1(a)-23. If the answer to Interrogatory 1(a)-19 is affirmative, do you take the same position with respect to emergency planning responsibilities in the event of a natural disaster? If not, describe in detail the bases for the difference in your positions.

INTERROGATORIES ON CONTENTION 1(b)

1(b)-1. Identify the "interfaces" between on-site and off-site response organizations which you contend are not specified in the emergency response plans for the Callaway Plant.

1(b)-2. For each interface identified in the answer to the preceding interrogatory, state in detail all facts which support your contention that such interfaces must be specified in the emergency response plans for the Callaway Plant.

1(b)-3. For each interface identified in the answer to Interrogatory 1(b)-2, identify all documents which support your contention that such interfaces must be specified in the emergency plans for the Callaway Plant.

1(b)-4. For each interface identified in the answer to Interrogatory 1(b)-2, identify all persons whom you expect to testify on your behalf in support of your contention that such interfaces must be specified in the emergency response plans for the Callaway Plant.

1(b)-5. Describe in detail the alleged inadequacies in the communication system(s) between the Callaway Plant and local governments.

1(b)-6. State in detail all facts which support your contention that the communication system(s) between the Callaway Plant and local governments are inadequate.

1(b)-7. Identify all documents which support your contention that the communication system(s) between the Callaway Plant and local governments are inadequate.

1(b)-8. Identify all persons whom you expect to testify on your behalf in support of your contention that the communication system(s) between the Callaway Plant and local governments are inadequate.

1(b)-9. Describe in detail the alleged inadequacies in the current emergency response agreements between Applicant and the support agencies as contained in Appendix C to the Callaway RERP.

1(b)-10. State in detail all facts which support your contention that the current emergency response agreements contained in Appendix C to the Callaway RERP are inadequate.

1(b)-11. Identify all documents which support your contention that the current emergency response agreements contained in Appendix C to the Callaway RERP are inadequate.

1(b)-12. Identify all persons whom you expect to testify on your behalf in support of your contention that the current emergency response agreements contained in Appendix C to the Callaway RERP are inadequate.

1(b)-13. Appendix C to the Callaway RERP contains several letters of agreement to provide emergency response support by off site agencies and organizations. Identify those additional agencies and organizations which you contend must supply letters of agreement in support of the Callaway RERP.

1(b)-14. For each agency or organization identified in the answer to the preceding interrogatory, state in detail all facts which support your contention that letters of agreement must be entered into by such agencies or organizations.

1(b)-15. For each agency or organization identified in the answer to Interrogatory 1(b)-13, identify all documents which support your contention that letters of agreements must be entered into by such agencies or organizations.

1(b)-16. For each agency or organization identified in the answer to Interrogatory 1(b)-13, identify all persons whom you expect to testify on your behalf in support of your contention that letters of agreement must be entered into by such agencies or organizations.

INTERROGATORIES ON CONTENTION 1(c)

1(c)-1. Do you contend that the emergency response plans for the Callaway Plant do not identify all local assistance which may be required in the event of an emergency at the Callaway Plant?

1(c)-2. If the answer to the preceding interrogatory is affirmative, identify those local assistance arrangements which you contend must be specified in the emergency response plans for the Callaway Plant.

1(c)-3. State in detail all facts which support your contention that the local assistance arrangements identified in your answer to the preceding interrogatory must be specified in the emergency response plans for the Callaway Plant.

1(c)-4. Identify all documents which support your contention that the local assistance arrangements identified in the answer to Interrogatory 1(c)-2 must be specified in the emergency response plans for the Callaway Plant.

1(c)-5. Identify all persons whom you expect to testify on your behalf in support of your contention that the local assistance arrangements identified in the answer to Interrogatory 1(c)-2 must be specified in the emergency response plans for the Callaway Plant.

1(c)-6. Do you contend that the communications facilities between Applicant's Emergency Operations Facility ("EOF") and the local Emergency Operations Centers ("EOC") are inadequate?

1(c)-7. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the EOF to EOC communications facilities are inadequate.

1(c)-8. If the answer to Interrogatory 1(c)-6 is affirmative, identify all documents which support your contention that the EOF to EOC communications facilities are inadequate.

1(c)-9. If the answer to Interrogatory 1(c)-6 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the EOF to EOC communications facilities are inadequate.

1(c)-10. If the answer to Interrogatory 1(c)-6 is affirmative, state in detail:

- (a) the type of communications capability which you contend is required at Applicant's EOF;
- (b) all facts which support your contention that a communications capability as described in (a) above is required;
- (c) the identification of each document which supports your contention that a communications capability as described in (a) above is needed at Applicant's EOF.

INTERROGATORIES ON CONTENTION 1(d)

1(d)-1. Do you contend that the emergency response plans for the Callaway Plant do not include a discussion of the emergency action levels?<sup>2</sup>

1(d)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the emergency response plans for the Callaway Plant do not include information on the emergency action levels.

1(d)-3. If the answer to Interrogatory 1(d)-1 is affirmative, identify all documents which support your

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<sup>2</sup> Emergency action levels are those described in Appendix 1 to NUREG-0654.

contention that the emergency response plans for the Callaway Plant do not include information on the emergency action levels. In this regard, identify those emergency response plans and standard operating procedures which fail to include information on emergency action levels.

1(d)-4. If the answer to Interrogatory 1(d)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the emergency response plans for the Callaway Plant do not include information on emergency action levels.

1(d)-5. Do you contend that the county Standard Operating Procedures do not include a description of the actions to be taken by emergency response personnel following notification of an emergency at the Callaway Plant?

1(d)-6. If the answer to the preceding interrogatory is affirmative, identify the emergency response personnel whose duties you contend are not included in the county Standard Operating Procedures.

1(d)-7. For each position identified in the answer to Interrogatory 1(d)-6, identify those specific actions required of each position which you contend must be included in the county Standard Operating Procedures.

INTERROGATORIES ON CONTENTION 1(e)

1(e)-1. Do you contend that the local emergency response plans and/or county Standard Operating Procedures must contain provisions to be followed by each support organization for notifying emergency response personnel in the event of an emergency at the Callaway Plant?

1(e)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that provisions for personnel notification by each support organization must be included in the local emergency response plans and/or county Standard Operating Procedures.

1(e)-3. If the answer to Interrogatory 1(e)-1 is affirmative, identify all documents which support your contention that provisions for personnel notification by each support organization must be included in the local emergency response plans and/or county Standard Operating Procedures.

1(e)-4. If the answer to Interrogatory 1(e)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that provisions for personnel notification by each support organization must be included in the local emergency response plans and/or the county Standard Operating Procedures.

1(e)-5. Describe in detail the communications equipment you contend must be provided in order to assure

prompt notification of county administrative judges and other emergency response personnel in the event of an emergency at the Callaway Plant.

1(e)-6. State in detail all facts which support your contention that the communications equipment identified in the answer to the preceding interrogatory is required.

1(e)-7. Identify all documents which support your contention that the communications equipment identified in the answer to the Interrogatory 1(e)-5 is required.

1(e)-8. Identify all persons whom you expect to testify on your behalf in support of your contention that the communications equipment identified in the answer to Interrogatory 1(e)-5 is required.

1(e)-9. Do you contend that the communications equipment identified in the answer to Interrogatory 1(e)-5 would also be required in the event of an emergency due to a natural disaster? If not, describe in detail the bases for the difference in your positions.

#### INTERROGATORIES ON CONTENTION 1(f)

1(f)-1. Do you contend that the Sheriffs' radio networks will be utilized as the primary means of communication between the local EOC and emergency response personnel in the event of an emergency at the Callaway Plant?

1(f)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the Sheriffs' radio network will be the primary means of communications between the local EOCs and emergency response personnel.

1(f)-3. If the answer to Interrogatory 1(f)-1 is affirmative, identify all documents which support your contention that the Sheriffs' radio networks will be the primary means of communication between the local EOCs and emergency response personnel.

1(f)-4. If the answer to Interrogatory 1(f)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the Sheriffs' radio networks will be the primary means of communication between the local EOCs and emergency response personnel.

1(f)-5. State in detail all facts which support your contention that the Sheriffs' radio networks would become overloaded if used for emergency communications in the event of an emergency at the Callaway plant.

1(f)-6. Identify all documents which support your contention that the Sheriffs' radio networks would become overloaded if used for emergency communications in the event of an emergency at the Callaway plant.

1(f)-7. Identify all persons whom you expect to testify on your behalf in support of your contention that the Sheriffs' radio networks would become overloaded if used for emergency communications in the event of an emergency at the Callaway Plant.

1(f)-8. Do you contend that the Sheriffs' radio networks would become overloaded if used for emergency communications in the event of a natural disaster?

1(f)-9. If the answer to the preceding interrogatory is negative, describe in detail the bases for the difference in your position with respect to the radio networks' capability in the event of an emergency at the Callaway Plant versus an emergency due to a natural disaster.

1(f)-10. Describe in detail the communications equipment you contend is required in order to provide adequate communications between the EOCs and emergency response personnel in the event of an emergency at the Callaway Plant.

1(f)-11. State in detail all facts which support your contention that the communications equipment identified in the answer to Interrogatory 1(f)-10 is required.

1(f)-12. Identify all documents which support your contention that the communications equipment identified in the answer to Interrogatory 1(f)-10 is required.

1(f)-13. Identify all persons whom you expect to testify on your behalf in support of your contention that the communications equipment identified in the answer to Interrogatory 1(f)-10 is required.

1(f)-14. Do you contend that the communications equipment identified in the answer to Interrogatory 1(f)-10 would also be required in the event of an emergency due to a natural disaster? If not, describe in detail the bases for the difference in your positions.

1(f)-15. State in detail all facts which support your contention that the existing law enforcement or fire response radio networks are inadequate due to their short range and potential dead spots in area coverage.

1(f)-16. Identify all documents which support your contention that the existing law enforcement or fire response radio networks are inadequate due to their short range and potential dead spots in area coverage.

1(f)-17. Identify all persons whom you expect to testify on your behalf in support of your contention that the existing law enforcement or fire response radio networks are inadequate due to their short range and potential dead spots in area coverage.

INTERROGATORIES ON CONTENTION 1(g)

1(g)-1. Do you contend that Applicant and the local county governments have failed to make adequate provisions for the dissemination of public information and education materials as required by 10 C.F.R. § 50.47(b)(7)?

1(g)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of 10 C.F.R. § 50.47(b)(7) have not been met.

1(g)-3. If the answer to Interrogatory 1(g)-1 is affirmative, identify all documents which support your contention that the requirements of 10 C.F.R. § 50.47(b)(7) have not been met.

1(g)-4. If the answer to Interrogatory 1(g)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of 10 C.F.R. § 50.47(b)(7) have not been met.

1(g)-5. Describe in detail the "informational links" between Applicant and the local county governments which you contend are required by 10 C.F.R. § 50.47(b)(7) and are not provided for in the emergency response plans for the Callaway Plant.

1(g)-6. State in detail all facts which support your contention that the informational links identified in the answer to the preceding interrogatory are required by 10 C.F.R. § 50.47(b)(7) and are not provided for in the emergency response plans for the Callaway Plant.

1(g)-7. Identify all documents which support your contention that the informational links identified in the answer to Interrogatory 1(g)-5 are required by 10 C.F.R. § 50.47(b)(7) and are not provided for in the emergency response plans for the Callaway Plant.

1(g)-8. Identify all persons whom you expect to testify on your behalf in support of your contention that the informational links identified in the answer to Interrogatory 1(g)-5 are required by 10 C.F.R. § 50.47(b)(7) and are not provided for in the emergency response plans for the Callaway Plant.

1(g)-9. Do you contend that formal letters of agreement are needed between the local county governments and the radio and/or television stations identified in the emergency response plans and the county Standard Operating Procedures in order for the governments to have authority to transmit emergency broadcast messages?

1(g)-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts which

support your contention that such formal letters of agreement are required.

1(g)-11. If the answer to Interrogatory 1(g)-9 is affirmative, identify all documents which support your contention that such formal letters of agreement are required.

1(g)-12. If the answer to Interrogatory 1(g)-9 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such formal letters of agreement are required.

INTERROGATORIES ON CONTENTION 1(h)

1(h)-1. State in detail all facts which support your contention that the local county governments do not have emergency operating centers (EOCs).

1(h)-2. Identify all documents which support your contention that the local county governments do not have EOCs.

1(h)-3. Identify all persons whom you expect to testify on your behalf in support of your contention that the local county governments do not have EOCs.

1(h)-4. State in detail all facts which support your contention that the local county governments do not have the equipment necessary for the creation of an EOC.

1(h)-5. Identify all documents which support your contention that the local county governments do not have the equipment necessary for the creation of an EOC.

1(h)-6. Identify all persons whom you expect to testify on your behalf in support of your contention that the local county governments do not have the equipment necessary for the creation of an EOC.

1(h)-7. Describe in detail all the equipment which you contend is required to be available at each county EOC.

1(h)-8. State in detail all facts which support your contention that the equipment identified in the answer to the preceding interrogatory is required to be available at each county EOC.

1(h)-9. Identify all documents which support your contention that the equipment identified in the answer to Interrogatory 1(h)-7 is required to be available at each county EOC.

1(h)-10. Identify all persons whom you expect to testify on your behalf in support of your contention that the equipment identified in the answer to Interrogatory 1(h)-7 is required to be available at each county EOC.

1(h)-11. Identify the radiation protection and communications equipment which you contend is required for emergency response workers.

1(h)-12. State in detail all facts which support your contention that the equipment identified in the answer to Interrogatory 1(h)-11 is required for emergency response workers.

1(h)-13. Identify all documents which support your contention that the equipment identified in the answer to Interrogatory 1(h)-11 is required for emergency response workers.

1(h)-14. Identify all persons whom you expect to testify on your behalf in support of your contention that the equipment identified in the answer to Interrogatory 1(h)-11 is required for emergency response workers.

INTERROGATORIES ON CONTENTION 1(i)

1(i)-1. Do you contend that Annexes A and D to the State of Missouri Nuclear Accident Plan fail to provide for radiation monitoring as required by 10 C.F.R. § 50.47(b)(9)?

1(i)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Annexes A and D to the State of Missouri Nuclear Accident Plan fail to provide for radiation monitoring as required by 10 C.F.R. § 50.47(b)(9).

1(i)-3. If the answer to Interrogatory 1(i)-1 is affirmative, identify all documents which support your

contention that Annexes A and D to the State of Missouri Nuclear Accident Plan fail to provide for radiation monitoring as required by 10 C.F.R. § 50.47(b)(9).

1(i)-4. If the answer to Interrogatory 1(i)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Annexes A and D to the State of Missouri Nuclear Accident Plan fail to provide for radiation monitoring as required by 10 C.F.R. § 50.47(b)(9).

1(i)-5. Do you contend that 10 C.F.R. § 50.47(b)(9) requires state and local governments to have equipment available which is capable of monitoring alpha emissions or the presence of radioiodides?

1(i)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that state and local governments are required to have equipment available capable of monitoring alpha emissions or the presence of radioiodides.

1(i)-7. If the answer to Interrogatory 1(i)-5 is affirmative, identify all documents which support your contention that state and local governments are required to have equipment available capable of monitoring alpha emissions or the presence of radioiodides.

1(i)-8. If the answer to Interrogatory 1(i)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the state and local governments are required to have equipment available capable of monitoring alpha emissions or the presence of radioiodides.

1(i)-9. Identify the "protective equipment" which you contend is required for emergency response workers who man road blocks or monitor evacuees leaving a contaminated or suspected contaminated area.

1(i)-10. State in detail all facts which support your contention that the equipment identified in the answer to the preceding interrogatory is required for emergency response workers who man roadblocks or monitor evacuees leaving a contaminated or suspected contaminated area.

1(i)-11. Identify all documents which support your contention that the equipment identified in the answer to Interrogatory 1(i)-9 is required for emergency response workers who man roadblocks or monitor evacuees leaving a contaminated or suspected contaminated area.

1(i)-12. Identify all persons whom you expect to testify on your behalf in support of your contention that the equipment identified in the answer to Interrogatory 1(i)-9 is required for emergency response workers who man roadblocks or

monitor evacuees leaving a contaminated or suspected contaminated area.

1(i)-13. Do you contend that the emergency response plans for the Callaway Plant do not contain provisions to make the equipment identified in the answer to Interrogatory 1(i)-9 available to emergency response workers?

1(i)-14. Do you contend that 10 C.F.R. § 50.47 (b)(9) requires the provision of pre-sited decontamination centers?

1(i)-15. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that 10 C.F.R. § 50.47(b)(9) requires the provision of pre-sited decontamination centers.

1(i)-16. If the answer to Interrogatory 1(i)-14 is affirmative, identify all documents which support your contention that 10 C.F.R. § 50.47(b)(9) requires the provision of pre-sited decontamination centers.

1(i)-17. If the answer to Interrogatory 1(i)-14 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that 10 C.F.R. § 50.47(b)(9) requires the provision of pre-sited decontamination centers.

1(i)-18. Do you contend that the state and local governments are required to provide facilities capable of evaluating personnel exposures and radionuclide uptake?

1(i)-19. If the answer to the preceding interrogatory is affirmative, identify the facilities and equipment you contend the state and local governments are required to have available in order to evaluate personnel exposure and radionuclide uptake.

1(i)-20. If the answer to Interrogatory 1(i)-18 is affirmative, state in detail all facts which support your contention that the state and local governments are required to have facilities available capable of evaluating personnel exposures and radionuclide uptake.

1(i)-21. If the answer to Interrogatory 1(i)-18 is affirmative, identify all documents which support your contention that the state and local governments are required to have facilities available capable of evaluating personnel exposure and radionuclide uptake.

1(i)-22. If the answer to Interrogatory 1(i)-18 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the state and local governments are required to have facilities available capable of evaluating personnel exposures and radionuclide uptake.

INTERROGATORIES ON CONTENTION 1(j)

1(j)-1. State in detail all facts which support your contention that protective actions for the plume exposure pathway emergency planning zone have not been developed.

1(j)-2. Identify all documents which support your contention that protective actions for the plume exposure pathway emergency planning zone have not been developed.

1(j)-3. Identify all persons whom you expect to testify on your behalf in support of your contention that protective actions for the plume exposure pathway emergency planning zone have not been developed.

1(j)-4. State in detail all facts which support your contention that protective actions for the ingestion exposure emergency planning zone which are appropriate for the locale have not been developed.

1(j)-5. Identify all documents which support your contention that protective actions for the ingestion exposure emergency planning zone which are appropriate to the locale have not been developed.

1(j)-6. Identify all persons whom you expect to testify on your behalf in support of your contention that protective actions for the ingestion exposure emergency planning zone which are appropriate to the locale have not been developed.

1(j)-7. Do you contend that the guidance provided in Annex C to the State of Missouri Nuclear Accident Plan (page C-21) fails to provide appropriate ad-hoc respiratory protection for the general public?

1(j)-8. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Annex C to the State of Missouri Nuclear Accident Plan fails to provide appropriate guidance for ad-hoc respiratory protection for the general public.

1(j)-9. If the answer to Interrogatory 1(j)-7 is affirmative, identify all documents which support your contention that Annex C to the State of Missouri Nuclear Accident Plan fails to provide appropriate guidance for ad-hoc respiratory protection for the general public.

1(j)-10. If the answer to Interrogatory 1(j)-7 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Annex C to the State of Missouri Nuclear Accident Plan fails to provide appropriate guidance for ad-hoc respiratory protection for the general public.

1(j)-11. Identify the respiratory protection equipment you contend is required for the general public.

1(j)-12. State in detail all facts which support your contention that the equipment identified in the answer to the preceding interrogatory is required for respiratory protection for the general public.

1(j)-13. Identify all documents which support your contention that the equipment identified in the answer to Interrogatory 1(j)-11 is required for respiratory protection for the general public.

1(j)-14. Identify all persons whom you expect to testify on your behalf in support of your contention that the equipment identified in the answer to Interrogatory 1(j)-11 is required for respiratory protection for the general public.

1(j)-15. Do you contend that the Federal government requires that provisions be made for the distribution of the potassium iodide to emergency workers or the general public in the vicinity of nuclear power plants?

1(j)-16. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the Federal government requires that provisions be made for the distribution of the potassium iodide to emergency workers or the general public in the vicinity of nuclear power plants.

1(j)-17. If the answer to Interrogatory 1(j)-15 is affirmative, identify all documents which support your contention that the Federal government requires that provisions be made for the distribution of potassium iodide to emergency workers or the general public in the vicinity of nuclear power plants.

1(j)-18. If the answer to Interrogatory 1(j)-15 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the Federal government requires that provisions be made for the distribution of potassium iodide to emergency workers or the general public in the vicinity of nuclear power plants.

INTERROGATORIES ON CONTENTION 1(k)

1(k)-1. State in detail all facts which support your contention that the local governments have not established a means for controlling radiological exposures of emergency workers.

1(k)-2. Identify all documents which support your contention that the local governments have not established a means for controlling radiological exposures of emergency workers.

1(k)-3. Identify all persons whom you expect to testify on your behalf in support of your contention that the local governments have not established a means for controlling radiological exposures of emergency workers.

INTERROGATORIES ON CONTENTION 1(1)

1(1)-1. State in detail all facts which support your contention that no arrangements have been made to provide medical services for contaminated or injured individuals.

1(1)-2. Identify all documents which support your contention that no arrangements have been made to provide medical services for contaminated or injured individuals.

1(1)-3. Identify all persons whom you expect to testify on your behalf in support of your contention that no arrangements have been made to provide medical services for contaminated or injured individuals.

1(1)-4. Do you contend that the local ambulance districts must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant?

1(1)-5. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the local ambulance districts must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of emergency at the Callaway Plant.

1(1)-6. If the answer to Interrogatory 1(1)-4 is affirmative, identify all documents which support your contention that the local ambulance districts must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant.

1(1)-7. If the answer to Interrogatory 1(1)-4 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the local ambulance districts must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant.

1(1)-8. If the answer to Interrogatory 1(1)-4 is affirmative, do you take the same position with respect to the need for such agreements in the event of an emergency due to a natural disaster? If not, describe in detail the bases for the difference in your positions.

1(1)-9. Do you contend that ambulance districts located outside the plume exposure pathway emergency planning zone must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant.

1(1)-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the ambulance districts located outside the plume exposure pathway emergency planning zone must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant.

1(1)-11. If the answer to Interrogatory 1(1)-9 is affirmative, identify all documents which support your contention that the ambulance districts located outside the plume exposure pathway emergency planning zone must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant.

1(1)-12. If the answer to Interrogatory 1(1)-9 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the ambulance districts located outside the plume exposure pathway emergency planning zone must enter into formal agreements with the local governments before they can be relied upon to provide transportation assistance in the event of an emergency at the Callaway Plant.

1(1)-13. If the answer to Interrogatory 1(1)-9 is affirmative, do you take the same position with respect to the

need for such agreements in the event of an emergency due to a natural disaster? If not, describe in detail the bases for the difference in your positions.

INTERROGATORIES ON CONTENTION 1(m)

1(m)-1. Do you contend that the reentry/recovery procedures contained in Procedure No. 14 of the county Standard Operating Procedures do not provide adequate guidance or instructions for recovery and/or reentry activities?

1(m)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Procedure No. 14 provides inadequate guidance for reentry and/or recovery actions.

1(m)-3. If the answer to Interrogatory 1(m)-1 is affirmative, identify all documents which support your contention that Procedure No. 14 is inadequate in providing guidance for reentry and/or recovery actions.

1(m)-4. If the answer to Interrogatory 1(m)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Procedure No. 14 contains inadequate guidance for reentry and/or recovery actions.

1(m)-5. If the answer to Interrogatory 1(m)-1 is affirmative, describe in detail the additional reentry and/or

recovery criteria which you contend are required to be included in the emergency response plans and/or procedures.

INTERROGATORIES ON CONTENTION 1(n)

1(n)-1. Identify all local organizations which you contend are required to participate in emergency response drills and/or exercises.

1(n)-2. State in detail all facts which support your contention that no local organization has agreed to participate in emergency response drills and/or exercises.

1(n)-3. Identify all documents which support your contention that no local organization has agreed to participate in emergency response drills and/or exercises.

1(n)-4. Identify all persons whom you expect to testify on your behalf in support of your contention that no local organization has agreed to participate in emergency response drills and/or exercises.

INTERROGATORIES ON CONTENTION 1(o)

1(o)-1. Section 14.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 15 of the county Standard Operating Procedures describe the radiological training which will be provided to off-site emergency response workers. Do you contend that the training described in these documents does not meet the requirements of 10 C.F.R. § 50.47(b)(15)?

1(o)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the training programs described in the Callaway Offsite Emergency Response Plan and the county Standard Operating Procedures do not meet the requirements of 10 C.F.R. § 50.47(b)(15).

1(o)-3. If the answer to Interrogatory 1(o)-1 is affirmative, identify all documents which support your contention that the training programs described in the Callaway Offsite Emergency Response Plan and in the county Standard Operating Procedures do not meet the requirements of 10 C.F.R. § 50.47(b)(15).

1(o)-4. If the answer to Interrogatory 1(o)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the training programs described in the Callaway Offsite Emergency Response Plan and the county Standard Operating Procedures do not meet the requirements of 10 C.F.R. § 50.47(b)(15).

INTERROGATORIES ON CONTENTION 1(p)

1(p)-1. Do you contend that 10 C.F.R. § 50.47(b)(16) requires local emergency planners to exist at all local governmental levels?

1(p)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your

contention that emergency planners are required at all local governmental levels.

1(p)-3. If the answer to Interrogatory 1(p)-1 is affirmative, identify all documents which support your contention that emergency planners are required at all local governmental levels.

1(p)-4. If the answer to Interrogatory 1(p)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that emergency planners are required at all local governmental levels.

1(p)-5. Do you contend that Section 8.2 of the Callaway RERP, page 1-8 of the Callaway Offsite Emergency Response Plan and page 14 of the State of Missouri Nuclear Accident Plan fail to provide for review and update of the emergency response plans for the Callaway Plant?

1(p)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that provisions have not been made for the review and update of the emergency response plans for the Callaway Plant.

1(p)-7. If the answer to Interrogatory 1(p)-5 is affirmative, identify all documents which support your contention that provisions have not been made for the review and update of the emergency response plans for the Callaway Plant.

1(p)-8. If the answer to Interrogatory 1(p)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that provisions have not been made for the review and update of the emergency response plans for the Callaway Plant.

1(p)-9. Do you contend that Annex E to the State of Missouri Nuclear Accident Plan fails to provide for training of local emergency planners?

1(p)-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Annex E to the State of Missouri Nuclear Accident Plan fails to provide for training of local emergency planners.

1(p)-11. If the answer to Interrogatory 1(p)-9 is affirmative, identify all documents which support your contention that Annex E to the State of Missouri Nuclear Accident Plan fails to provide for training of local emergency planners.

1(p)-12. If the answer to Interrogatory 1(p)-9 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Annex E to the State of Missouri Nuclear Accident Plan fails to provide for training of local emergency planners.

INTERROGATORIES ON CONTENTION 2

2-1. Do you contend that the counties of Callaway, Osage, Gasconade and Montgomery are financially unable to provide and maintain an adequate emergency response capability?

2-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the local counties are financially unable to provide and maintain an adequate emergency response capability.

2-3. If the answer to Interrogatory 2-1 is affirmative, identify all documents which support your contention that the local counties are financially unable to provide and maintain an adequate emergency response capability.

2-4. If the answer to Interrogatory 2-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the local counties are financially unable to provide and maintain an adequate emergency response capability.

2-5. If the answer to Interrogatory 2-1 is affirmative, state in detail:

- (a) your estimate of the additional funding required for each local government to provide and maintain an adequate emergency response capability;

- (b) the method by which you calculated your estimate of the additional funding required by each local government to provide and maintain an adequate emergency response capability;
- (c) the date, title and author of each document upon which you relied on making your estimate of the additional funding required; and
- (d) the name, address, employer, position and qualifications of each person who assisted in making your estimate of the required additional funding.

2-6. Do you contend that any Commission regulations or other applicable regulations or laws require Applicant to provide funding for the local governments' emergency response functions?

2-7. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support your contention that Applicant is legally required to provide funding for the local governments' emergency response functions.

2-8. If the answer to Interrogatory 2-6 is affirmative, identify all documents which support your contention that Applicant is legally required to provide funding for the local governments' emergency response functions.

2-9. If the answer to Interrogatory 2-6 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Applicant is legally required to provide funding for the local governments' emergency response functions.

INTERROGATORIES ON CONTENTION 3(1)

3(1)-1. Do you contend that the emergency response plans for the Callaway Plant do not identify the State, local, Federal and private sector organizations that are intended to be part of the overall response organization for responding to emergencies at the Callaway Plant as required by Criterion A.1.a of NUREG-0654?

3(1)-2. If the answer to the preceding interrogatory is affirmative, identify those response organizations which you contend must be identified in the emergency response plans for the Callaway site.

3(1)-3. For each organization identified in response to the preceding interrogatory, state in detail all facts which support your contention that such organizations must be identified in the emergency response plans for the Callaway Plant.

3(1)-4. For each organization identified in the answer to Interrogatory 3(1)-2, identify all documents which support your contention that such organizations must be identified in the emergency response plans for the Callaway Plant.

3(1)-5. For each organization identified in the answer to Interrogatory 3(1)-2, identify all persons whom you expect to testify on your behalf in support of your contention that such organizations must be identified in the emergency response plans for the Callaway Plant.

INTERROGATORIES ON CONTENTION 3(2)

3(2)-1. Do you contend that Criterion A.1.b of NUREG-0654 requires the emergency response plans for the Callaway Plant to specify the concept of operations and relationship to the total response effort for response organizations other than those affiliated with Applicant or the State and local governments?

3(2)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion A.1.b of NUREG-0654 requires the concept of operations and relationship to the total response effort to be specified for non-government or non-utility affiliated organizations.

3(2)-3. If the answer to Interrogatory 3(2)-1 is affirmative, identify all documents which support your contention that Criterion A.1.b of NUREG-0654 requires the concept of operations and relationship to the total response effort to be specified for non-government or non-utility affiliated organizations.

3(2)-4. If the answer to Interrogatory 3(2)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion A.1.b of NUREG-0654 requires the concept of operations and relationship to the total response effort to be specified for non-government or non-utility affiliated organizations.

3(2)-5. Identify those response organizations whose concept of operations and relationship to the total response effort you contend must be included in the emergency response plans for the Callaway Plant.

3(2)-6. Do you contend that the emergency response plans for the Callaway Plant do not specify the concept of operations and relationship to the total response effort for the State and local governments within the plume exposure pathway?

3(2)-7. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the emergency response plans for the Callaway

Plant do not include the concept of operations and relationship to the total response effort for the applicable government organizations.

3(2)-8. If the answer to Interrogatory 3(2)-6 is affirmative, identify all documents which support your contention that the emergency response plans for the Callaway Plant do not specify the concept of operations and relationship to the total response effort for the applicable government organizations.

3(2)-9. If the answer to Interrogatory 3(2)-6 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the emergency response plans for the Callaway Plant do not specify the concept of operations and relationship to the total response effort for the applicable government organizations.

INTERROGATORIES ON CONTENTION 3(3)

3(3)-1. Identify those organizations for which you contend that the emergency response plans for the Callaway Plant fail to include an identification of the individual in charge of the subject organization.

INTERROGATORIES ON CONTENTION 3(4)

3(4)-1. Do you contend that Criterion A.2.b. of NUREG-0654 requires that formal letters of agreement be entered into by incorporated cities or other localities within a county

which has assumed responsibility for providing emergency response capability in the event of an emergency at the Callaway Site?

3(4)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such localities are required to enter into separate letters of agreement.

3(4)-3. If the answer to Interrogatory 3(4)-1 is affirmative, identify all documents which support your contention that such localities are required to enter into separate letters of agreement.

3(4)-5. If the answer to Interrogatory 3(4)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such localities are required to enter into separate letters of agreement.

3(4)-5. Identify those localities for which you contend the emergency response plans for the Callaway Plant do not include a reference to the applicable legal authorities for those localities.

#### INTERROGATORIES ON CONTENTION 3(6)

3(6)-1. Identify those principal response organizations which you contend do not have a 24-hour operational capability for protracted periods as required by Criterion A.4 of NUREG-0654.

3(6)-2. For each organization identified in the answer to the preceding interrogatory, state in detail all facts which support your contention that such organizations do not have a 24-hour operational capability for protracted periods.

3(6)-3. For each organization identified in the answer to Interrogatory 3(6)-1, identify all documents which support your contention that those organizations do not have a 24-hour operational capability for protracted periods.

3(6)-4. For each organization identified in the answer to Interrogatory 3(6)-1, identify all persons whom you expect to testify on your behalf in support of your contention that such organizations do not have a 24-hour operational capability for protracted periods.

3(6)-5. State in detail all facts which support your contention that volunteer organizations are unable to provide individuals for long-term operations.

3(6)-6. Identify all documents which support your contention that volunteer organizations are unable to provide individuals for long-term operations.

3(6)-7. Identify all persons whom you expect to testify on your behalf in support of your contention that volunteer organizations are unable to provide individuals for long-term operations.

INTERROGATORIES ON CONTENTION 3(7)

3(7)-1. State in detail all facts which support your contention that the emergency response plans for the Callaway Plant fail to identify facilities, organizations and individuals who can be relied upon to provide assistance in the event of an emergency at the Callaway Plant.

3(7)-2. Identify all documents which support your contention that the emergency response plans for the Callaway Plant fail to identify facilities, organizations and individuals who can be relied upon for providing assistance in the event of an emergency at the Callaway Plant.

3(7)-3. Identify all persons whom you expect to testify on your behalf in support of your contention that the emergency response plans for the Callaway Plant fail to identify facilities, organizations and individuals who can be relied upon to provide assistance in the event of an emergency at the Callaway Plant.

3(7)-4. Identify those specific facilities, organizations and individuals whom you contend may be relied upon to provide emergency assistance and who are not currently identified in the emergency response plans for the Callaway Plant.

3(7)-5. For each facility, organization and individual identified in the answer to preceding interrogatory,

state in detail all facts which support your contention that such facilities, organizations or individuals may be relied upon to provide assistance in the event of an emergency at the Callaway Plant.

3(7)-6. For each facility, organization and individual identified in the answer to Interrogatory 3(7)-4, identify those documents which support your contention that such facilities, organizations or individuals may be relied upon for assistance in the event of emergency at the Callaway Plant.

3(7)-7. For each facility, organization and individual identified in the answer to Interrogatory 3(7)-4, identify all persons whom you expect to testify on your behalf in support of your contention that such facilities, organizations and individuals may be relied upon for assistance in the event of an emergency at the Callaway Plant.

3(7)-8. Do you contend that individual employees of support organizations must enter into formal letters of agreement before they can be relied upon to provide assistance in the event of an emergency at the Callaway Plant?

3(7)-9. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such individual employees are required to enter into formal letters of agreement.

3(7)-10. If the answer to Interrogatory 3(7)-8 is affirmative, identify all documents which support your contention that such individual employees are required to enter into formal letters of agreement.

3(7)-11. If the answer to Interrogatory 3(7)-8 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such individual employees are required to enter into formal letters of agreement.

INTERROGATORIES ON CONTENTION 3(8)

3(8)-1. Annexes A and B to the State of Missouri Nuclear Accident Plan, the county Standard Operating Procedures and Section 9.0 of the Callaway Offsite Emergency Response Plan provide guidance regarding emergency actions to be taken by government organizations and other support organizations in the event of an emergency at the Callaway Plant. Do you contend that the guidance contained in these plans and procedures does not meet the requirements of Criterion D.4 of NUREG-0654?

3(8)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the state and local plans and procedures do not meet the requirements of Criterion D.4 of NUREG-0654.

3(8)-3. If the answer to Interrogatory 3(8)-1 is affirmative, identify all documents which support your

contention that the state and local plans and procedures do not meet the requirements of Criterion D.4 of NUREG-0654.

3(8)-4. If the answer to Interrogatory 3(8)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the state and local plans and procedures do not meet the requirements of Criterion D.4 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(9)

3(9)-1. Do you contend that the provisions of Procedure No. 4 of the county Standard Operating Procedures regarding notification of emergency response personnel do not meet the requirements of Criterion E.2 of NUREG-0654?

3(9)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Procedure No. 4 of the county Standard Operating Procedures does not meet the requirements of Criterion E.2 of NUREG-0654.

3(9)-3. If the answer to Interrogatory 3(9)-1 is affirmative, identify all documents which support your contention that Procedure No. 4 of the county Standard Operating Procedures does not meet the requirements of Criterion E.2 of NUREG-0654.

3(9)-4. If the answer to Interrogatory 3(9)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Procedure No. 4 of the county Standard Operating Procedures does not meet the requirements of Criterion E.2 of NUREG-0654.

3(9)-5. Do you contend that Criterion E.2 of NUREG-0654 requires the local emergency response plans and/or procedures to include specific instructions for notification of emergency personnel during weekends and non-duty hours?

3(9)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your assertion that specific instructions must be included for notifying emergency personnel during weekends and non-duty hours.

3(9)-7. If the answer to Interrogatory 3(9)-5 is affirmative, identify all documents which support your contention that the local plans or procedures must contain instructions for notification of emergency response personnel during weekends and non-duty hours.

3(9)-8. If the answer to Interrogatory 3(9)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the local plans and/or procedures must contain specific instructions for notification of emergency response personnel during weekends and non-duty hours.

INTERROGATORIES ON CONTENTION 3(10)

3(10)-1. Do you contend that the draft Emergency Broadcast System announcements contained in Annex C to the Missouri Nuclear Accident Plan and the provisions of Procedure Nos. 4 and 5 of the county Standard Operating Procedures do not meet the requirements of Criterion E.7 of NUREG-0654?

3(10)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the draft Emergency Broadcast System announcements contained in Annex C to the Missouri Nuclear Accident Plan and the provisions of Procedure Nos. 4 and 5 of the county Standard Operating Procedures do not meet the requirements of Criterion E.7 of NUREG-0654.

3(10)-3. If the answer to Interrogatory 3(10)-1 is affirmative, identify all documents which support your contention that the draft Emergency Broadcast System announcements contained in Annex C to the Missouri Nuclear Accident Plan and the provisions of Procedure Nos. 4 and 5 of the county Standard Operating Procedures do not meet the requirements of Criterion E.7 of NUREG-0654.

3(10)-4. If the answer to Interrogatory 3(10)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the draft Emergency Broadcast System announcements contained in Annex C

to the Missouri Nuclear Accident Plan and the provisions of Procedure Nos. 4 and 5 of the county Standard Operating Procedures do not meet the requirements of Criterion E.7 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(11)

3(11)-1. Do you contend that Criterion F.1.d requires the provision of communications facilities between emergency response field workers and local EOCs or among teams of emergency response field workers?

3(11)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such communications facilities are required by Criterion F.1.d of NUREG-0654.

3(11)-3. If the answer to Interrogatory 3(11)-1 is affirmative, identify all documents which support your contention that such communications facilities are required by Criterion F.1.d of NUREG-0654.

3(11)-4. If the answer to interrogatory 3(11)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such communications facilities are required by Criterion F.1.d of NUREG-0654.

3(11)-5. Identify those "support services" which you contend may be required by Criterion F.1.d of NUREG-0654.

3(11)-6. State in detail all facts which support your contention that the support services identified in the response to the preceding interrogatory may be required by Criterion F.1.d of NUREG-0654.

3(11)-7. Identify all documents which support your contention that the support services identified in the answer to Interrogatory 3(11)-5 may be required by Criterion F.1.d. of NUREG-0654.

3(11)-8. Identify all persons whom you expect to testify on your behalf in support of your contention that the support services identified in the answer to Interrogatory 3(11)-5 may be required by Criterion F.1.d of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(12)

3(12)-1. Do you contend that the county Standard Operating Procedures do not include provisions for alerting/activating emergency personnel as required by Criterion F.1.e of NUREG-0654?

3(12)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the county Standard Operating Procedures fail to include provisions for alerting/activating emergency personnel as required by Criterion F.1.e of NUREG-0654.

3(12)-3. If the answer to Interrogatory 3(12)-1 is affirmative, identify all documents which support your contention that the county Standard Operating Procedures fail to include provisions for alerting/activating emergency personnel as required by Criterion F.1.e of NUREG-0654.

3(12)-4. If the answer to Interrogatory 3(12)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the county Standard Operating Procedures fail to include provisions for alerting/activating emergency personnel as required by Criterion F.1.e of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(13)

3(13)-1. Do you contend that the provisions of Section 5.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 7 of the county Standard Operating Procedures do not meet the requirements of Criterion F.2 of NUREG-0654?

3(13)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support your contention that Section 5.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 7 of the county Standard Operating Procedures do not meet the requirements of Criterion F.2 of NUREG-0654.

3(13)-3. If the answer to Interrogatory 3(13)-1 is affirmative, identify all documents which support your

contention that the provisions of Section 5.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 7 of the county Standard Operating Procedures do not meet the requirements of Criterion F.2 of NUREG-0654.

3(13)-4. If the answer to Interrogatory 3(13)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the provisions of Section 5.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 7 of the county Standard Operating Procedures do not meet the requirements of Criterion F.2 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(14)

3(14)-1. State in detail all facts which support your contention that all local governments do not have an EOC<sup>3</sup> as required by Criterion H.3 of NUREG-0654.

3(14)-2. Identify all documents which support your contention that all local governments do not have an EOC as required by Criterion H.3 of NUREG-0654.

3(14)-3. Identify all persons whom you expect to testify on your behalf in support of your contention that all local governments do not have an EOC as required by Criterion H.3 of NUREG-0654.

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3 Intervenor Reed mistakenly alleged that the local governments do not have EOFs; however, NUREG-0654 requires licensees to maintain an EOF while local government organizations are required to maintain EOCs.

INTERROGATORIES ON CONTENTION 3(15)

3(15)-1. Do you contend that Criterion H.7 of NUREG-0654 requires each local organization to provide offsite radiological monitoring equipment in the vicinity of the Callaway Plant?

3(15)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that each local organization must provide radiological monitoring equipment in the vicinity of the Callaway Plant.

3(15)-3. If the answer to Interrogatory 3(15)-1 is affirmative, identify all documents which support your contention that each local organization must provide radiological monitoring equipment in the vicinity of the Callaway Plant.

3(15)-4. If the answer to Interrogatory 3(15)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that each local organization is required to provide radiological monitoring equipment in the vicinity of the Callaway Plant.

3(15)-5. Do you contend that Criterion H.7 of NUREG-0654 requires the provision of radiological monitoring equipment capable of detecting or measuring iodines or alpha particles in the vicinity of the Callaway Plant?

3(15)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion H.7 of NUREG-0654 requires radiological monitoring equipment capable of detecting or measuring iodines or alpha particles be provided in the vicinity of the Callaway Plant.

3(15)-7. If the answer to Interrogatory 3(15)-5 is affirmative, identify all documents which support your contention that Criterion H.7 of NUREG-0654 requires radiological monitoring equipment capable of detecting or measuring iodines or alpha particles be provided in the vicinity of the Callaway Plant.

3(15)-8. If the answer to Interrogatory 3(15)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that NUREG-0654 requires radiological monitoring equipment capable of detecting or measuring iodines or alpha particles be provided in the vicinity of the Callaway Plant.

#### INTERROGATORIES ON CONTENTION 3(16)

3(16)-1. Do you contend that Section 8.3 of the Callaway RERP and Annex D to the State of Missouri Nuclear Accident Plan fail to provide for reserve equipment as required by Criterion H.10 of NUREG-0654?

3(16)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that sufficient reserves of emergency equipment will not be provided as required by Criterion H.10 of NUREG-0654.

3(16)-3. If the answer to Interrogatory 3(16)-1 is affirmative, identify all documents which support your contention that sufficient reserves of emergency equipment will not be provided as required by Criterion H.10 of NUREG-0654.

3(16)-4. If the answer to Interrogatory 3(16)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that sufficient reserves of emergency equipment will not be provided as required by Criterion H.10 of NUREG-0654.

#### INTERROGATORIES ON CONTENTION 3(17)

3(17)-1. Do you contend that the identification of equipment available to emergency response workers in the county Standard Operating Procedures fails to meet the requirements of Criterion H.11 of NUREG-0654?

3(17)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion H.11 of NUREG-0654 have not been met.

3(17)-3. If the answer to Interrogatory 3(17)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion H.11 of NUREG-0654 have not been met.

3(17)-4. If the answer to Interrogatory 3(17)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion H.11 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(18)

3(18)-1. Section 8.0 of the Callaway Offsite Emergency Response Plan and Section 7.1.4 of the Callaway RERP state that Applicant's EOF will serve as the central point for receipt and analysis of radiological field monitoring data. Do you contend that the use of Applicant's EOF as the central point for receipt and analysis of radiological field monitoring data does not meet the requirements of Criterion H.12 of NUREG-0654?

3(18)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion H.12 of NUREG-0654 have not been met.

3(18)-3. If the answer to Interrogatory 3(18)-1 is affirmative, identify all documents which support your contention that the requirements of criterion H-12 of NUREG-0654 have not been met.

3(18)-4. If the answer to Interrogatory 3(18)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion H.12 have not been met.

INTERROGATORIES ON CONTENTION 3(19)

3(19)-1. Radiological monitoring capabilities for the area in the vicinity of the Callaway Plant are described in Section 8.0 of the Callaway Offsite Emergency Response Plan and in Annex D to the Missouri Nuclear Accident Plan. Do you contend that the provisions set forth in these plans do not meet the requirements of Criterion I.7 of NUREG-0654?

3(19)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion I.7 have not been met.

3(19)-3. If the answer to Interrogatory 3(19)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion I.7 of NUREG-0654 have not been met.

3(19)-4. If the answer to Interrogatory 3(19)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion I.7 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(20)

3(20)-1. Do you contend that the accident assessment and radiological monitoring provisions of Section 8.0 of the Callaway Offsite Emergency Response Plan and Annexes A and D to the Missouri Nuclear Accident Plan do not meet the requirements of Criterion I.8 of NUREG-0654?

3(20)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion I.8 of NUREG-0654 have not been met.

3(20)-3. If the answer to Interrogatory 3(20)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion I.8 of NUREG-0654 have not been met.

3(20)-4. If the answer to Interrogatory 3(20)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion I.8 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(21)

3(21)-1. Do you contend that reliance by the State of Missouri upon the federal Department of Energy to perform monitoring of radioiodine concentrations as low as  $10^{-7}$  uCi/cc is prohibited by the provisions of Criterion I.9 of NUREG-0654?

3(21)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the State of Missouri has failed to meet the requirements of Criterion I.9 of NUREG-0654?

3(21)-3. If the answer to Interrogatory 3(21)-1 is affirmative, identify all documents which support your contention that the State of Missouri has failed to meet the requirements of Criterion I.8 of NUREG-0654.

3(21)-4. If the answer to Interrogatory 3(21)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the State of Missouri has failed to meet the requirements of Criterion I.9 of NUREG-0654.

3(21)-5. Do you contend that Criterion I.9 of NUREG-0654 requires the capability to "rapidly" detect and measure radioiodine concentrations?

3(21)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion I.9 of NUREG-0654 requires the "rapid" detection and measurement of radioiodine concentrations.

3(21)-7. If the answer to Interrogatory 3(21)-5 is affirmative, identify all documents which support your

contention that Criterion I.9 of NUREG-0654 requires the "rapid" detection and measurement of radioiodine concentrations.

3(21)-8. If the answer to Interrogatory 3(21)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion I-9 of NUREG-0654 requires the "rapid" detection and measurement of radioiodine concentrations.

INTERROGATORIES ON CONTENTION 3(22)

3(22)-1. Do you contend that Criterion I.10 of NUREG-0654 requires the publication of separate procedures for estimating integrated dose rates?

3(22)-2. If the answer to the preceding interrogatory is affirmative, identify those procedures which you contend are required by Criterion I.10 of NUREG-0654.

3(22)-3. Do you contend that the provisions contained in Annex B to the Missouri Nuclear Accident Plan, at pages B-12 through B-16, fail to meet the requirements of Criterion I.10 of NUREG-0654?

3(22)-4. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the provisions of Annex B to the Missouri Nuclear Accident Plan fail to meet the requirements of Criterion I.10 of NUREG-0654.

3(22)-5. If the answer to Interrogatory 3(22)-3 is affirmative, identify all documents which support your contention that the provisions of Annex B to the Missouri Nuclear Accident Plan fail to meet the requirements of Criterion I.10 of NUREG-0655.

3(22)-6. If the answer to Interrogatory 3(22)-3 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the provisions of Annex B to the Missouri Nuclear Accident Plan fail to meet the requirements of Criterion I.10 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(23)

3(23)-1. Describe in detail the state and local responsibilities which you contend are required by Criterion J.2 of NUREG-0654.

3(23)-2. State in detail all facts which support your contention that the state and local responsibilities identified in the answer to Interrogatory 3(23)-1 are required by Criterion J.2 of NUREG-0654.

3(23)-3. Identify all documents which support your contention that the state and local responsibilities identified in the answer to Interrogatory 3(23)-1 are required by Criterion J.2 of NUREG-0654.

3(23)-4. Identify all persons whom you expect to testify on your behalf in support of your contention that the state and local responsibilities identified in the answer to Interrogatory 3(23)-1 are required by Criterion J.2 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(24)

3(24)-1. Do you contend that the state and local emergency response plans must include a discussion of how Applicant will meet the provisions of Criterion J.6 of NUREG-0654?

3(24)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support your contention that the state and local emergency response plans must include a discussion of Applicant's compliance with Criterion J.6 of NUREG-0654.

3(24)-3. If the answer to Interrogatory 3(24)-1 is affirmative, identify all documents which support your contention that the state and local emergency response plans must include a discussion of Applicant's compliance with Criterion J.6 of NUREG-0654.

3(24)-4. If the answer to Interrogatory 3(24)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the state and local emergency response plans must include a discussion of Applicant's compliance with Criterion J.6 of NUREG-0654.

3(24)-5. Do you contend that Section 6.4.2 of the Callaway RERP fails to meet the requirements of Criterion J.6 of NUREG-0654?

3(24)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Section 6.4.2 of the Callaway RERP does not meet the requirements of Criterion J.6 of NUREG-0654.

3(24)-7. If the answer to Interrogatory 3(24)-5 is affirmative, identify all documents which support your contention that Section 6.4.2 of the Callaway RERP does not meet the requirements of Criterion J.6 of NUREG-0654.

3(24)-8. If the answer to Interrogatory 3(24)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Section 6.4.2 of the Callaway RERP does not meet the requirements of Criterion J.6 of NUREG-0654.

#### INTERROGATORIES ON CONTENTION 3(25)

3(25)-1. Do you contend that Criterion J.7 of NUREG-0654 requires Applicant to recommend protective actions to all local governments?

3(25)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion J.7 of NUREG-0654

requires Applicant to recommend protective actions to all local governments.

3(25)-3. If the answer to Interrogatory 3(25)-1 is affirmative, identify all documents which support your contention that Criterion J.7 of NUREG-0654 requires Applicant to recommend protective actions to all local governments.

3(25)-4. If the answer to Interrogatory 3(25)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion J.7 of NUREG-0654 requires Applicant to recommend protective actions to all local governments.

3(25)-5. Do you contend that Section 5.4 of the Callaway RERP and Procedure No. 4 of the county Standard Operating Procedures do not include provisions for prompt, direct recommendation of protective actions to local governments?

3(25)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the emergency response plans for the Callaway Plant fail to provide for prompt, direct recommendation of protective actions to all local governments.

3(25)-7. If the answer to Interrogatory 3(25)-5 is affirmative, identify all documents which support your

contention that the emergency response plans for the Callaway Plant fail to provide for prompt direct recommendation of protective actions to all local governments.

3(25)-8. If the answer to Interrogatory 3(25)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the emergency response plans for the Callaway Plant fail to provide for prompt, direct recommendation of protective actions to all local governments.

INTERROGATORIES ON CONTENTION 3(26)

3(26)-1. Do you contend that Annex A (AGR 3) and Annex B (pages B-7 through B-11) to the Missouri Nuclear Accident Plan and Procedure No. 13 of the county Standard Operating Procedures fail to meet the requirements of Criterion J.9 of NUREG-0654?

3(26)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion J.9 of NUREG-0654 have not been met.

3(26)-3. If the answer to Interrogatory 3(26)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion J.9 of NUREG-0654 have not been met.

3(26)-4. If the answer to Interrogatory 3(26)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion J.9 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(27)

3(27)-1. Figure 7.5 to the Callaway RERP provides the locations of the radiological monitoring equipment in the vicinity of the Callaway Plant; Figures 9-6 to 9-9 of the Callaway Offsite Emergency Response Plan and Procedure No.18 to the county Standard Operating Procedures include a description of the reception centers as well as maps of the reception centers' locations. Do you contend that this information fails to meet the requirements of Criterion J.10.a of NUREG-0654 regarding the provision of maps showing radiological sampling and monitoring locations and relocation centers?

3(27)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the provisions of Criterion J.10.a of NUREG-0654 regarding maps of radiological sampling and monitoring points and relocation centers have not been met.

3(27)-3. If the answer to Interrogatory 3(27)-1 is affirmative, identify all documents which support your contention that the provisions of Criterion J.10.a of NUREG-0654 regarding maps of radiation sampling and monitoring locations and relocation centers have not been met.

3(27)-4. If the answer to Interrogatory 3(27)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the provisions of Criterion J.10.a of NUREG-0654 regarding maps of radiation sampling and monitoring locations and relocation centers have not been met.

INTERROGATORIES ON CONTENTION 3(28)

3(28)-1. Do you contend that Section 9.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 9 of the county Standard Operating Procedures fail to meet the requirements of Criterion J.10.d of NUREG-0654?

3(28)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion J.10.d of NUREG-0654 have not been met.

3(28)-3. If the answer to Interrogatory 3(28)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion J.10.d of NUREG-0654 have not been met.

3(28)-4. If the answer to Interrogatory 3(28)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion J.10.d have not been met.

INTERROGATORIES ON CONTENTION 3(29)

3(29)-1. Do you contend that Criteria J.10.e and f of NUREG-0654 require the distribution of potassium iodide to emergency workers and the general public?

3(29)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criteria J.10.e and f require the distribution of potassium iodide to emergency workers and the general public.

3(29)-3. If the answer to Interrogatory 3(29)-1 is affirmative, identify all documents which support your contention that Criteria J.10.e and f require the distribution of potassium iodide to emergency workers and the general public.

3(29)-4. If the answer to Interrogatory 3(29)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criteria J.10.e and f of NUREG-0654 require the distribution of potassium iodide to emergency workers and the general public.

INTERROGATORIES ON CONTENTION 3(30)

3(30)-1. Do you contend that the guidance contained in Section 9.0 of the Callaway Offsite Emergency Response Plan and in Procedure No. 11 of the county Standard Operating Procedures will not allow for identification of and means for dealing with potential impediments to evacuation as required by Criterion J.10.k of NUREG-0654?

3(30)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Section 9.0 of the Callaway Offsite Emergency Plan and Procedure No. 11 of the county Standard Operating Procedures do not meet the requirements of Criterion J.10.k of NUREG-0654.

3(30)-3. If the answer to Interrogatory 3(30)-1 is affirmative, identify all documents which support your contention that Section 9.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 11 of the county Standard Operating Procedures do not meet the requirements of Criterion J.10.k of NUREG-0654.

3(30)-4. If the answer to Interrogatory 3(30)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Section 9.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 11 of the County Standard Operating Procedures fail to meet the requirements of Criterion J.10.k of NUREG-0654.

#### INTERROGATORIES ON CONTENTION 3(31)

3(31)-1. Appendix I of the Callaway RERP contains an evacuation time estimate study for evacuating the plume exposure pathway emergency planning zone for the Callaway Plant. Do you contend that this evacuation time estimate study does not meet the requirements of Criteria J.10.1 and m of NUREG-0654?

3(31)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the evacuation time estimate study contained in the Callaway RERP does not meet the requirements of Criteria J.10.1 and m of NUREG-0654.

3(31)-3. If the answer to Interrogatory 3(31)-1 is affirmative, identify all documents which support your contention that the evacuation time estimate study contained in the Callaway RERP does not meet the requirements of Criteria J.10.1 and m of NUREG-0654.

3(31)-4. If the answer to Interrogatory 3(31)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the evacuation time estimate study contained in the Callaway RERP does not meet the requirements of Criteria J.10.1 and m of NUREG-0654.

3(31)-5. Do you contend that separate evacuation time estimate studies must be contained in the State of Missouri Nuclear Accident Plan and in the Callaway Offsite Emergency Response Plan?

3(31)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the state and local emergency response plans must include separate evacuation time estimate studies.

3(31)-7. If the answer to Interrogatory 3(31)-5 is affirmative, identify all documents which support your contention that the state and local emergency response plans must include separate evacuation time estimate studies.

3(31)-8. If the answer to Interrogatory 3(31)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the state and local emergency response plans must include separate evacuation time estimate studies.

3(31)-9. Do you contend that the guidance contained in Section 9.0 of the Callaway Offsite Emergency Response Plan and in Procedure No. 8 of the county Standard Operating Procedures fails to take into account the time required for evacuation in determining whether evacuation is an appropriate protective action?

3(31)-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the guidance for undertaking evacuation fails to take into account the time required for evacuating the plume exposure pathway emergency planning zone.

3(31)-11. If the answer to Interrogatory 3(31)-9 is affirmative, identify all documents which support your contention that the guidance for undertaking evacuation fails to take into account the time required for evacuating the plume exposure pathway emergency planning zone.

3(31)-12. If the answer to Interrogatory 3(31)-9 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the guidance for undertaking evacuation fails to take into account the time required for evacuating the plume exposure pathway emergency planning zone.

INTERROGATORIES ON CONTENTION 3(32)

3(32)-1. Do you contend that the provisions of Annex B, pages B7 through B11, of the State of Missouri Nuclear Accident plan fail to meet the requirements of Criterion J.11 of NUREG-0654?

3(32)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Annex B of the State of Missouri Nuclear Accident Plan fails to meet the requirements of Criterion J.11 of NUREG-0654.

3(32)-3. If the answer to Interrogatory 3(32)-1 is affirmative, identify all documents which support your contention that Annex B to the State of Missouri Nuclear Accident Plan does not meet the requirements of Criterion J.11 of NUREG-0654.

3(32)-4. If the answer to Interrogatory 3(32)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Annex B to the

State of Missouri Nuclear Accident Plan does not meet the requirements of Criterion J.11 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(33)

3(33)-1. The Standard Operating Procedures for the State of Missouri Division of Family Services (Annex A to the State of Missouri Nuclear Accident Plan) and Procedure No. 18 of the county Standard Operating Procedures set forth procedures to be followed for the registration and radiological monitoring of evacuees at reception centers. Do you contend that these procedures fail to meet the requirements of Criterion J.12 of NUREG-0654?

3(33)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the county Standard Operating Procedures and the Division of Family Services Standard Operating Procedures do not meet the requirements of Criterion J.12 of NUREG-0654.

3(33)-3. If the answer to Interrogatory 3(33)-1 is affirmative, identify all documents which support your contention that the county Standard Operating Procedures and the Division of Family Services Standard Operating Procedures do not meet the requirements of Criterion J.12 of NUREG-0654.

3(33)-4. If the answer to Interrogatory 3(33)-1 is affirmative, identify all persons whom you expect to testify on

your behalf in support of your contention that the county Standard Operating Procedures and the Division of Family Services Standard Operating Procedures do not meet the requirements of Criterion J.12 of NUREG-0654.

3(33)-5. Do you contend that Criterion J.12 of NUREG-0654 requires local governments to provide traffic control from evacuation areas to host areas?

3(33)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion J.12 of NUREG-0654 requires local governments to provide traffic control from evacuation areas to host areas.

3(33)-7. If the answer to Interrogatory 3(33)-5 is affirmative, identify all documents which support your contention that Criterion J.12 of NUREG-0654 requires local governments to provide traffic control from evacuation areas to host areas.

3(33)-8. If the answer to Interrogatory 3(33)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion J.12 of NUREG-0654 requires local governments to provide traffic control from evacuation areas to host areas.

3(33)-9. Do you contend that Procedure No. 11 of the County Standard Operating Procedures fails to provide adequate guidance for traffic control from evacuation areas to host areas?

3(33)-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Procedure No. 11 of the County Standard Operating Procedures fails to provide adequate guidance for traffic control from evacuation areas to host areas.

3(33)-11. If the answer to Interrogatory 3(33)-9 is affirmative, identify all documents which support your contention that Procedure No. 11 of the county Standard Operating Procedures fails to provide adequate guidance for traffic control from evacuation areas to host areas.

3(33)-12. If the answer to Interrogatory 3(33)-9 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Procedure No. 11 of the county Standard Operating Procedures fails to provide adequate guidance for traffic control from evacuation areas to host areas.

INTERROGATORIES ON CONTENTION 3(34)

3(34)-1. Do you contend that Sections 8.0 and 10.0 of the Callaway Offsite Emergency Response Plan and Annexes A (BRH Procedures) and D to the State of Missouri Nuclear Accident Plan fail to provide guidance for assuring monitoring and recording of doses received by emergency response workers as required by Criterion K.3 of NUREG-0654?

3(34)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion K.3 of NUREG-0654 have not been met.

3(34)-3. If the answer to Interrogatory 3(34)-1 is affirmative, identify all documents that support your contention that the requirements of Criterion K.3 of NUREG-0654 have not been met.

3(34)-4. If the answer to Interrogatory 3(34)-1 is affirmative, identify those persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion K.3 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(35)

3(35)-1. Do you contend that Section 10.0 of the Callaway Offsite Emergency Response Plan and Annex D to the State of Missouri Nuclear Accident Plan do not meet the requirements of Criterion K.4 of NUREG-0654 regarding the

authorization of radiological exposures to emergency workers in excess of EPA protective action guidelines?

3(35)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion K.4 of NUREG-0654 have not been met.

3(35)-3. If the answer to Interrogatory 3(35)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion K.4 of NUREG-0654 have not been met.

3(35)-4. If the answer to Interrogatory 3(35)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion K.4 of NUREG-0654 have not been met.

#### INTERROGATORIES ON CONTENTION 3(36)

3(36)-1. Do you contend that Section 12.0 of the Callaway Offsite Emergency Response Plan and Annex D to the State of Missouri Nuclear Accident Plan do not meet the requirements of Criterion K.5 of NUREG-0654 regarding the need to carry out decontamination activities?

3(36)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion K.5 of NUREG-0654 have not been met.

3(36)-3. If the answer to Interrogatory 3(36)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion K.5 of NUREG-0654 have not been met.

3(36)-4. If the answer to Interrogatory 3(36)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion K.5 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(37)

3(37)-1. Do you contend that the provisions for obtaining medical services as described in Section 11.0 of the Callaway Offsite Emergency Response Plan and in Procedure No. 13 of the county Standard Operating Procedures fail to meet the requirements of Criterion L.1 of NUREG-0654?

3(37)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion L.1 of NUREG-0654 have not been met.

3(37)-3. If the answer to Interrogatory 3(37)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion L.1 of NUREG-0654 have not been met.

3(37)-4. If the answer to Interrogatory 3(37)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion L.1 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(38)

3(38)-1. Do you contend that the provisions of Section 11.0 of the Callaway Offsite Emergency Response Plan, Procedure No. 13 of the county Standard Operating Procedures, and Annex F to the State of Missouri Nuclear Accident Plan fail to provide for the transportation of radiological accident victims as required by Criterion L.4 of NUREG-0654?

3(38)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion L.4 of NUREG-0654 have not been met.

3(38)-3. If the answer to Interrogatory 3(38)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion L.4 of NUREG-0654 have not been met.

3(38)-4. If the answer to Interrogatory 3(38)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion L.4 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(39)

3(39)-1. Do you contend that the plans and procedures for reentry and recovery as set forth in Section III.A.11 of the State of Missouri Nuclear Accident Plan and Annex A thereto, Section 12.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 14 of the county Standard Operating Procedures fail to meet the requirements of Criterion M.1 of NUREG-0654?

3(39)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion M.1 of NUREG-0654 have not been met.

3(39)-3. If the answer to Interrogatory 3(30)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion M.1 of NUREG-0654 have not been met.

3(39)-4. If the answer to Interrogatory 3(39)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion M.1 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(40)

3(40)-1. Do you contend that Section III.A.11 of the State of Missouri Nuclear Accident Plan does not include a description of the means by which members of response

organizations will be informed that recovery is to be initiated as required by Criterion M.3 of NUREG-0654?

3(40)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the State of Missouri Nuclear Accident Plan does not meet the requirements of Criterion M.3 of NUREG-0654.

3(40)-3. If the answer to Interrogatory 3(40)-1 is affirmative, identify all documents which support your contention that the State of Missouri Nuclear Accident Plan does not meet the requirements of Criterion M.3 of NUREG-0654.

3(40)-4. If the answer to Interrogatory 3(40)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the State of Missouri Nuclear Accident Plan does not meet the requirements of Criterion M.3 of NUREG-0654.

3(40)-5. Do you contend that Criterion M.3 of NUREG-0654 requires the State of Missouri Nuclear Accident Plan to set forth the radiation levels at which recovery is possible/practical?

3(40)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion M.3 of NUREG-0654

requires the State of Missouri Nuclear Accident Plan to set forth the radiation levels at which recovery is possible/practical.

3(40)-7. If the answer to Interrogatory 3(40)-5 is affirmative, identify all documents which support your contention that Criterion M.3 of NUREG-0654 requires the State of Missouri Nuclear Accident Plan to set forth the radiation levels at which recovery is possible/practical.

3(40)-8. If the answer to interrogatory 3(40)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion M.3 of NUREG-0654 requires the State of Missouri Nuclear Accident Plan to set forth the radiation levels at which recovery is possible/practical.

#### INTERROGATORIES ON CONTENTION 3(41)

3(41)-1. Do you contend that Criterion M.4 of NUREG-0654 requires local government organizations to establish a method for periodically estimating total population exposure?

3(41)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion M.4 of NUREG-0654 requires local government organizations to establish a method for periodically estimating total population exposure.

3(41)-3. If the answer to Interrogatory 3(41)-1 is affirmative, identify all documents which support your contention that Criterion M.4 of NUREG-0654 requires local government organizations to establish a method for periodically estimating total population exposure.

3(41)-4. If the answer to Interrogatory 3(41)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion M.4 requires local government organizations to establish a method for periodically estimating total population exposure.

3(41)-5. Do you contend that Annex B to the State of Missouri Nuclear Accident Plan fails to meet the requirements of Criterion M.4 of NUREG-0654?

3(41)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Annex B to the State of Missouri Nuclear Accident Plan fails to meet the requirements of Criterion M.4 of NUREG-0654.

3(41)-7. If the answer to Interrogatory 3(41)-5 is affirmative, identify all documents which support your contention that Annex B to the State of Missouri Nuclear Accident Plan fails to meet the requirements of Criterion M.4 of NUREG-0654.

3(41)-8. If the answer to Interrogatory 3(41)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Annex B to the State of Missouri Nuclear Accident Plan fails to meet the requirements of Criterion M.4 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(42)

3(42)-1. Do you contend that Criteria N.1.b or N.2.a, c, d require that formal written agreements be entered into by local response organizations in order to assure the participation of these organizations in emergency planning exercises and drills?

3(42)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such formal written agreements are required by Criteria N.1 and N.2 of NUREG-0654.

3(42)-3. If the answer to Interrogatory 3(42)-1 is affirmative, identify all documents which support your contention that such formal written agreements are required by Criteria N.1 and N.2 of NUREG-0654.

3(42)-4. If the answer to Interrogatory 3(42)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that such formal written agreements are required by Criteria N.1 and N.2 of NUREG-0654.

INTERROGATORIES ON CONTENTION 3(43)

3(43)-1. Do you contend that Section 13.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 16 of the county Standard Operating Procedures fail to meet the requirements of Criterion N.3 of NUREG-0654 regarding a description of the emergency planning exercises and drills that the local organizations will undertake?

3(43)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion N.3 of NUREG-0654 have not been met.

3(43)-3. If the answer to Interrogatory 3(43)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion N.3 of NUREG-0654 have not been met.

3(43)-4. If the answer to Interrogatory 3(43)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion N.3 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(44)

3(44)-1. Do you contend that Criterion N.4 of NUREG-0654 requires an identification, by name or title, of the official observers of emergency planning exercises and drills undertaken by the local response organizations?

3(44)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion N.4 of NUREG-0654 requires the identification, by name or title, of official observers of drills and exercises.

3(44)-3. If the answer to Interrogatory 3(44)-1 is affirmative, identify all documents which support your contention that Criterion N.4 of NUREG-0654 requires an identification, by name or title, of official observers of exercises and drills.

3(44)-4. If the answer to Interrogatory 3(44)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion N.4 of NUREG-0654 requires an identification, by name or title, of official observers of exercises and drills.

3(44)-5. Do you contend that Section 13.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 16 of the county Standard Operating Procedures do not include provisions for the observation of emergency planning drills and exercises?

3(44)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the local plans and procedures do not contain provisions for observation of emergency planning exercises and drills.

3(44)-7. If the answer to Interrogatory 3(44)-5 is affirmative, identify all documents which support your contention that the local plans and procedures do not contain provisions for observation of emergency planning exercises and drills.

3(44)-8. If the answer to Interrogatory 3(44)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the local plans and procedures do not contain provisions for the observation of emergency planning exercises and drills.

INTERROGATORIES ON CONTENTION 3(45)

3(45)-1. Do you contend that Section 13.0 of the Callaway Offsite Emergency Response Plan and Procedure No. 16 of the county Standard Operating Procedures fail to include a means for evaluation of observer/participant comments of emergency planning exercises and drills as required by Criterion N.5 of NUREG-0654?

3(45)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criterion N.5 of NUREG-0654 have not been met.

3(45)-3. If the answer to Interrogatory 3(45)-1 is affirmative, identify all documents which support your contention that the requirements of Criterion N.5 of NUREG-0654 have not been met.

3(45)-4. If the answer to Interrogatory 3(45)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criterion N.5 of NUREG-0654 have not been met.

INTERROGATORIES CN CCNTENTION 3(46)

3(46)-1. Do you contend that the radiological emergency response training for local emergency response workers described in Section 14.0 of the Callaway Offsite Emergency Response Plan and in Procedure No. 15 of the county Standard Operating Procedures fails to meet the requirement of Criteria O.1, O.4 and O.5 of NUREG-0654?

3(46)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the training to be provided to local emergency response workers does not meet the requirements of Criteria O.1, O.4 and O.5 of NUREG-0654.

3(46)-3. If the answer to Interrogatory 3(46)-1 is affirmative, identify all documents which support your contention that the training to be provided to local emergency response workers does not meet the requirements of Criteria O.1, O.4 and O.5 of NUREG-0654.

3(46)-4. If the answer to Interrogatory 3(46)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the training for

local emergency response workers does not meet the requirements of Criteria 0.1, 0.4 and 0.5 of NUREG-0654.

3(46)-5. Do you contend that Criterion 0.4 of NUREG-0654 requires radiological monitoring equipment training for local emergency response workers?

3(46)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Criterion 0.4 of NUREG-0654 requires radiological monitoring equipment training for local emergency response workers.

3(46)-7. If the answer to Interrogatory 3(46)-5 is affirmative, identify all documents which support your contention that Criterion 0.4 of NUREG-0654 requires radiological monitoring equipment training for local emergency response workers.

3(46)-8. If the answer to Interrogatory 3(46)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Criterion 0.4 of NUREG-0654 requires radiological monitoring equipment training for local emergency response workers.

INTERROGATORIES ON CONTENTION 3(47)

3(47)-1. Do you contend that Sections 1.0 and 14.0 of the Callaway Offsite Emergency Response Plan, Appendix 2 to the State of Missouri Nuclear Accident Plan and the county Standard Operating Procedures do not meet the requirements of Criteria P.1, P.6, P.7, and P.10 of NUREG-0654?

3(47)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the requirements of Criteria P.1, P.6, P.7 and P.10 of NUREG-0654 have not been met.

3(47)-3. If the answer to Interrogatory 3(47)-1 is affirmative, identify all documents which support your contention that the requirements of Criteria P.1, P.6, P.7 and P.10 of NUREG-0654 have not been met.

3(47)-4. If the answer to Interrogatory 3(47)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the requirements of Criteria P.1, P.6, P.7 and P.10 of NUREG-0654 have not been met.

INTERROGATORIES ON CONTENTION 3(48)

3(48)-1. Do you contend that Appendix 2 to NUREG-0654 requires that Applicant's system for monitoring radiological and meteorological data must be capable of being remotely accessed or interrogated from the state and local EOCs?

3(48)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that Applicant's system for monitoring radiological and meteorological data must be capable of being remotely accessed or interrogated from the state and local EOCs.

3(48)-3. If the answer to Interrogatory 3(48)-1 is affirmative, identify all documents which support your contention that Applicant's system for monitoring radiological and meteorological data must be capable of being remotely accessed or interrogated from the state and local EOCs.

3(48)-4. If the answer to Interrogatory 3(48)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that Applicant's system for monitoring radiological and meteorological data must be capable of being remotely accessed or interrogated from the state and local EOCs.

#### INTERROGATORIES ON CONTENTION 3(49)

3(49)-1. Do you contend that the prompt notification system described in Appendix L to the Callaway RERP will not meet the criteria set forth in Appendix 3 to NUREG-0654?

3(49)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the prompt notification system

described in Appendix L to the Callaway RERP will not meet the criteria set forth in Appendix 3 to NUREG-0654.

3(49)-3. If the answer to Interrogatory 3(49)-1 is affirmative, identify all documents which support your contention that the prompt notification system described in Appendix L to the Callaway RERP will not meet the criteria set forth in Appendix 3 to NUREG-0654.

3(49)-4. If the answer to Interrogatory 3(49)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the prompt notification system described in Appendix L to the Callaway RERP will not meet the criteria set forth in Appendix 3 to NUREG-0654.

3(49)-5. Do you contend that Appendix 3 to NUREG-0654 requires that the prompt notification system for the Callaway Plant plume exposure pathway emergency planning zone must be physically in place at the present time?

3(49)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the prompt notification system must be physically in place at the present time.

3(49)-7. If the answer to Interrogatory 3(49)-5 is affirmative, identify all documents which support your

contention that the prompt notification system must be physically in place at the present time.

3(49)-8. If the answer to Interrogatory 3(49)-5 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the prompt notification system must be physically in place at the present time.

INTERROGATORIES ON CONTENTION 3(50)

3(50)-1. Section 1.0 of the Callaway Offsite Emergency Response Plan identifies Callaway County as the lead county for emergency planning purposes; further, Section 1.0 states that each county is prepared to conduct 24-hour operations for a protracted period of time. Do you contend that these provisions of Section 1.0 of the Callaway Offsite Emergency Response Plan do not meet the guidance of NUREG-0654 which requires one lead local government agency having a 24 hour operational capability?

3(50)-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that the NUREG-0654 guidance for designating a lead local government agency for emergency planning purposes has not been met.

3(50)-3. If the answer to Interrogatory 3(50)-1 is affirmative, identify all documents which support your

contention that the guidance of NUREG-0654 for designating a lead local government agency for emergency planning purposes has not been met.

3(50)-4. If the answer to Interrogatory 3(50)-1 is affirmative, identify all persons whom you expect to testify on your behalf in support of your contention that the NUREG-0654 guidance designating a lead local government agency for emergency planning purposes has not been met.

3(50)-5. Do you contend that each local government agency must formally agree, in writing, to the designation of Callaway County as the lead local government agency for emergency planning purposes?

3(50)-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts which support your contention that such written formal agreements are required.

3(50)-7. If the answer to Interrogatory 3(50)-5 is affirmative, identify all documents which support your contention that such formal written agreements are required.

3(50)-8. If the answer to Interrogatory 3(50)-5 is affirmative, identify all persons whom you expect to testify on

your behalf in support of your contention that such formal written agreements are required.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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DATED: July 15, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
UNION ELECTRIC COMPANY	)	Docket No. STN 50-483 OL
	)	
(Callaway Plant, Unit 1)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Interrogatories and Requests for Production of Documents to Intervenor John G. Reed" were served this 15th day of July, 1982, by deposit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.

Thomas A. Baxter  
Thomas A. Baxter *njb*

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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