

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

UNION ELECTRIC COMPANY)

(Callaway Plant, Unit 1))

Docket No. STN 50-483 OL

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NOTICE OF INTENT TO TAKE TESTIMONY
BY DEPOSITION ON WRITTEN INTERROGATORIES

Under the provisions of 10 CFR, Section 2.740a, the undersigned gives notice of intent, to the persons identified herein and all other parties, to take the testimony of the persons identified below by deposition on written interrogatories previously submitted in this cause and contained in "John Reed's Interrogatories and Requests for Production of Documents (Set No. 1) To Callaway County Court Administrative Judges and Callaway County Emergency Management Coordinator" dated 14 June 1982 and submitted in due form on 16 June 1982.

The matters upon which each person shall be required to respond shall be related only to matters dealing with public health and safety or the environment and will concern radiological emergency response planning items and/or official opinions, judgements and/or decisions relating thereto.

Mr. Paul Murphy; Presiding Judge of the Callaway County Administrative Court, County Courthouse, Fulton, Missouri 65251 (residence - RFD, Holts Summit, Missouri 65043) shall answer questions relating to detailed aspects of proposed plans, official policy relating to acceptance of plan concepts and implementing procedures needed to make such concepts an operational reality; also how such actions may relate to environmental matters.

Mr. Robert Wright; Associate Judge of the Eastern District of Callaway County and official representative of the Callaway County Administrative Court in the above captioned matter, Callaway County Courthouse, Fulton, Missouri 65251 (residence RFD, Fulton, Missouri 65251) shall answer those questions relating to proposed plans, official policy, plan concepts, the implementing procedures and environmental matters.

Mr. Walter Clark; Callaway County Emergency Management Coordinator (Director), Callaway County Courthouse, Fulton, Missouri 65251 (residence RFD, New Bloomfield, Missouri 65063) shall respond to interrogatories as relate to the operational portions of plans, judgements dealing with the acceptance of planning concepts and methods of implementing the operational portions of said plans and how effective such plans and planning standards will be in protecting the public health and safety.

In compliance with 10 CFR, Section 2.740a(f), the written interrogatories were served on 16 June 1982. Each was numbered separately and consecutively as required. Testimony sought shall be identified by and refer to the same numbered questions as was previously submitted and identified above.

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PDR ADOCK 05000483
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Since all deponents are elected officials of Callaway County or is an employee of Callaway County, the interrogatories shall be taken before the County Clerk of Callaway County and in his presence respond to such questions under oath or affirmation. Said County Clerk being authorized by statute to administer oaths in the State of Missouri. The County Clerk of Callaway County is Mr. George (Red) Carrington, Office of the County Clerk, County Courthouse, Fulton, Missouri 65251.

Mr. Paul Murphy shall answer, under oath or affirmation, the questions contained in John Reed's Interrogatories, see above, and identified by the following numbers and/or letters:

Page 3; interrogatories number 2., a., b., c., d.,
Page 4; 2. (cont.), e., f., g., h., i., j., k., l., m., n.,
Page 5; 2. (cont.), o., p., q., interrogatories 3., 4., 5., 6.,
Page 6; interrogatories 7., 8., a., b., c., d., 9., 10.,
Page 7; interrogatories 11., 12., 13.,
Page 8; interrogatories 14., a., b., c., d.,
Page 9; 14. (cont.), e., f., g., h., i., interrogatories 15., 16.,
Page 10; interrogatories 17., 18., a., b., c., d., e.,
Page 11; 18. (cont.) f., g., interrogatory 19.,
Page 12; interrogatories 20., 22., 23.,
Page 13; interrogatories 24., a., b., c., etc.

Where questions are carried from page to page, the deponent shall answer the final portion of any interrogatory carried over to a following page if such interrogatory or portion thereof has been identified in the foregoing list.

Mr. Robert Wright shall answer the same questions as have been identified above. Mr. Wright's jurisdiction includes the plant site and the major part of the 10 mile EPZ; as such, his answers and their relation to the answers of Mr. Paul Murphy have significance in this matter.

Mr. Walter Clark shall answer the following questions which are identified in John Reed's Interrogatories, see above, under the following numbers and/or letters:

Page 3; interrogatories 2., a., b., c., d.,
Page 4; 2. (cont.), e., f., g., h., i., j., k., l., m., n.,
Page 5; 2. (cont.), o., p., interrogatories 3., 4., 5., 6.,
Page 6; interrogatory 7.,
Page 7; interrogatory 13.,
Page 8; interrogatory 14., a., b., c., d.,
Page 9; 14. (cont.), e., f., g., h., i., interrogatories 15., 16.,
Page 10; interrogatories 17., 18., a., b., c., d., e.,
Page 11; 18. (cont.) f., g., interrogatory 19.,
Page 12; interrogatories 20., 22., 23.,
Page 13; interrogatories 24., a., b., c., etc.

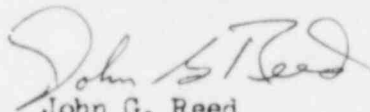
Where questions are carried from page to page, the deponent shall answer the final portion of the interrogatory if it or a portion thereof has been identified on the foregoing list.

Deponents shall reply to the above interrogatories within ten (10) days after service thereof and shall file an answer within twenty days after such service.

Failure of the persons identified above to respond, in time, to the above interrogatories or their refusal to answer the questions posed will be deemed by the undersigned to be an attempt to conceal evidence in this matter. In such case, it is the intent of Mr. Reed to request a subpoena be issued to each of the individuals identified above, by the Board, to force their appearance before the Atomic Safety and Licensing Board Panel to answer these same questions. Failure by any person to so appear is delineated in Section 233, of the Atomic Energy Act of 1954 (see 42 USC 2281).

Submission of this notice of intent to take testimony does not infer that the undersigned has or intends to defer from his previously submitted motion to compel discovery from the Callaway County Court Administrative Judges and the Callaway County Emergency Management Coordinator (director). If a representative of the County Court has the right to introduce evidence, etc. under the provisions of 10 CFR, Section 2.715(c), equity under NRC regulation and the Federal Rules of Civil Procedure must mandate that Mr. Reed has a right to discover such evidence, regardless of whether it is so introduced or withheld (suppressed) by said County Court.

Respectfully submitted,



John G. Reed
Citizen of the United States
of America

Dated this 13th day
of July 1982, at
Kingdom City, MO.

RFD #1
Kingdom City, Missouri 65262
tel: (314) 642-2769

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CERTIFICATE OF SERVICE

I hereby certify that the document attached hereto was served this

14th day of July, 1982 by deposit in the U.S. mail, first

class postage prepaid upon the following: (* hand delivered)

James P. Gleason, Esquire
Chairman, Atomic Safety and
Licensing Board Panel
513 Gilmore Drive
Silver Spring, Maryland 20901

Dr. Jerry R. Kline
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Kenneth M. Chackes, Esquire
Chackes and Hoare
314 N. Broadway
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Thomas A. Baxter, Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M. Street, N.W.
Washington, D.C. 20036

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

* Paul Murphy, Presiding Judge
Callaway County Court
Courthouse, Fulton, Mo. 65251

* Walter Clark, E.M.A. Coordinator
Callaway County Courthouse
Fulton, MO. 65251

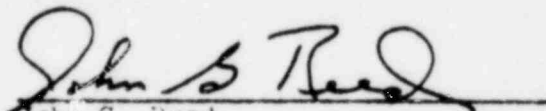
Mr. Glenn O. Bright
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Roy P. Lessy, Jr., Esquire
Office of the Executive Legal Director
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Washington, D.C. 20555

A. Scott Gauger, Esquire
Assistant General Counsel
MO. Public Service Commission
P.O. Box 360
Jefferson City, MO. 65102

* Robert Wright, Judge Eastern Dist.
Callaway County Court
County Courthouse
Fulton, Missouri 65251



John G. Reed
Citizen of the United States
of America