

May 20, 1983

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))

APPLICANT'S STATEMENT OF MATERIAL
FACTS ON REED CONTENTION 1 AS TO
WHICH THERE IS NO GENUINE ISSUE TO BE HEARD
(STAFFING - SHERIFF'S OFFICE)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 1 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. During an emergency, it is a common and acceptable practice for emergency workers, such as individuals performing law enforcement functions, to work a twelve hour shift.

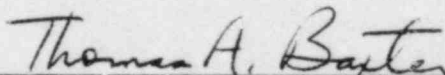
2. During an emergency, routine law enforcement activities need not be performed because relative to emergency-related functions, normal functions became unimportant and can even hinder necessary emergency activities.

3. The Missouri State Highway Patrol and the State National Guard have committed to respond and satisfy needed law enforcement functions in the four counties in the Callaway Plant plume exposure emergency planning zone ("EP2").

4. Because of the availability of local law enforcement officers and personnel from other local organizations assigned law enforcement-related functions in the county plans, supplemented as needed by members of the Highway Patrol and the National Guard, there are more than an adequate number of personnel to fulfill county law enforcement-related functions in the event of an emergency at the Callaway Plant.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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