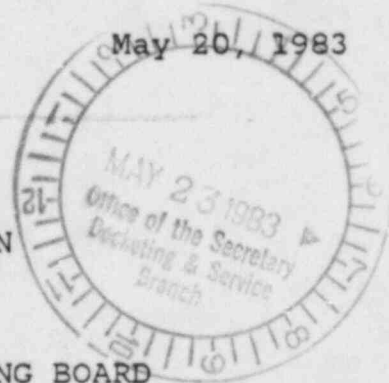


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



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 2 AS TO
WHICH THERE IS NO GENUINE ISSUE TO BE HEARD
(STAFFING - CLERK'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 2 in this proceeding, 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 clerical functions, to work a twelve hour shift.
2. During an emergency, it is a common and acceptable practice for routine clerical activities to be discontinued.

3. Individuals from the State National Guard will be available to augment clerical staff, if necessary, in the four counties in the Callaway Plant plume exposure emergency planning zone.

4. Because of the availability of local government personnel to fulfill necessary emergency clerical functions, supplemented as needed by members of the State National Guard, there are more than an adequate number of personnel to fulfill these functions in the event of an emergency at the Callaway Plant.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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May 20, 1983