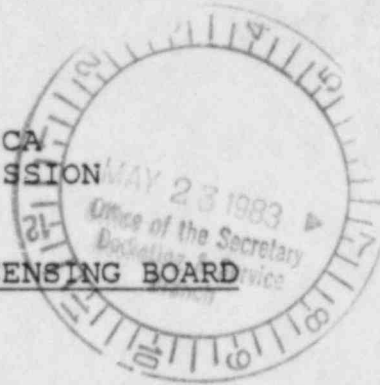


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

AFFIDAVIT OF WALTER M. CLARK
ON REED CONTENTION 2
(STAFFING -- CLERK'S OFFICE)

County of Callaway)
State of Missouri) ss.

WALTER M. CLARK, being duly sworn, deposes and says as follows:

1. I am the Emergency Management Director for Callaway County and the City of Fulton, Missouri. My business address is 510 Market Street, Fulton, Missouri 65251. A summary of my professional qualifications and experience is attached hereto as Exhibit "A". I have personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in response to Reed Contention 2 (Staffing - Clerk's Office).

2. The Callaway Plant, owned and operated by Union Electric Company, is located in Callaway County, Missouri.

3. I perform the function of Emergency Management Director for Callaway County and the City of Fulton on a part-time basis. Since March 15, 1982, I have worked with Union Electric Company planners, Union Electric Company consultants, the State Emergency Management Agency and local agencies in the development of the Callaway County/Fulton Radiological Emergency Response Plan (the "Callaway/Fulton Plan").

4. Reed Contention 2(A) describes the clerk's office personnel requirements which Mr. Reed believes are necessary for the Montgomery County Clerk to perform the duties assigned to him in the four-county emergency response plan and the Montgomery County Standard Operating Procedures. Contention 2(B) states that the manning shortages set forth in Contention 2(A) are applicable in the other three counties located in the Callaway Plant plume exposure pathway emergency planning zone ("EPZ"): Callaway, Gasconade and Osage Counties. The documents referred to by Mr. Reed have been revised. A county plan now exists for each of the four counties in the EPZ.

5. In view of the changes in the local offsite plans and procedures, this affidavit will address the ability of Callaway County and the City of Fulton to fulfill the clerical functions which are brought into question by Mr. Reed in Contention 2, as well as any other clerical functions identified in the revised plans. I will describe the clerk's office personnel requirements which, after consulting with the Callaway County Clerk

and the Fulton Clerk, I believe are necessary in Callaway County and Fulton, and the sources of manpower to fulfill those needs. In summary, I disagree with Mr. Reed's assessment, and conclude that there will be sufficient personnel available to fulfill the clerical functions which must be performed in Callaway County and the City of Fulton in the event of a radiological emergency at the Callaway Plant.

6. Within the EPZ, Callaway County has a population of approximately 15,300.

7. Three unstated and unexplained assumptions underlie Mr. Reed's analysis of clerical manning needs which are contrary to accepted emergency planning practices. These assumptions are (1) that an eight hour shift would be used for emergency workers during a radiological emergency at the Callaway Plant; (2) that all normal clerical functions would continue during a radiological emergency at the Callaway Plant; and (3) that only regularly employed clerical personnel would be available to fulfill emergency functions assigned in the Callaway/Fulton Plan. All three of these assumptions are unreasonable.

8. In my 25 years of experience working in the field of emergency preparedness, the common and accepted practice is for emergency workers, including individuals performing clerical functions, to work a twelve not an eight hour shift (at a

minimum) during emergencies of all kinds. In my opinion, individuals can perform satisfactorily on a twelve hour shift. In fact, rotating three shifts of personnel can create unnecessary confusion and lack of continuity in performing jobs under what are often complex and rapidly changing circumstances.

9. It is also unreasonable and inconsistent with the evidence accumulated from actual emergencies to assume that regular clerical personnel are required to be available during an emergency to perform their normal, routine functions. Priorities change during an emergency. Routine County/City clerical functions would be discontinued during the emergency period, and all personnel will be assigned emergency responsibilities.

10. In addition, Mr. Reed assumes that only regularly employed clerical personnel could fulfill clerical tasks in the event of a radiological emergency. This is an unreasonable assumption. If necessary, other adequately supervised individuals, such as members of the National Guard, could serve many of these largely ministerial functions.

11. I do not agree, and see no technical or pragmatic basis for various of Mr. Reed's manpower estimates to perform clerical functions in the event of a radiological emergency at the Callaway Plant. In my opinion, which is shared by the Callaway County Clerk and the Fulton Clerk, the most important

clerical function during a radiological emergency is ensuring that message center operations are adequate. This function is assigned to the County and the City Clerk, who are assisted by their regular staff. There will be five message center operators per shift. One of these individuals will be available to maintain a message log. See Reed Contention 2(A)(1).

12. If an evacuation is ordered, the general public will utilize personal vehicles to leave the affected area. It is anticipated that most individuals who are handicapped, without transportation, or in need of special transportation assistance will have previously been identified by means of a Transportation Registration Card which they will have received as a part of the emergency information brochure distributed before plant start-up. Based on this information, a pre-established vehicle routing system for those needing transportation will have been developed by the County Assessor. The County Assessor also will have previously prepared a list of transportation equipment and manpower available for evacuation, and obtained agreements reflecting the reliance on these resources in the event of a radiological emergency at the Callaway Plant. Thus, the function referred to in Reed Contention 2(A)(6) will be performed prior to an actual emergency. See Annex I to Callaway/Fulton Plan. During an emergency, only those individuals who need transportation and have not previously so registered will use the special phone number provided to the

public for this purpose. I believe that the availability of two individuals is sufficient to receive such requests for transportation. This function corresponds with the task identified by Mr. Reed in Contention 2(A)(7).

13. I am also of the opinion that the Emergency Management Director, the County Assessor and one of his assistants can satisfactorily (1) maintain a list of available vehicles, including special vehicles to transport the handicapped; and (2) maintain a list of estimated evacuees. Mr. Reed appears to concur with the combining of these tasks, which he identifies in Contention 2(A)(3), (4) and (5), although he suggests that one person per shift could perform these functions. In addition, the County Assessor could keep track of those individuals who have not yet been picked up. See Reed Contention 2(A)(8). As a part of his transportation responsibilities, the County Assessor also will activate pickup points for persons without evacuation transportation and, should the need arise, he will assist the State Emergency Management Agency in providing transportation from pre-established impoundment areas to reception and care facilities.

14. Reed Contention 2(A)(2) and (9) refer to the clerk's logistical support function, and the need for continuity of service. The former requirement can be satisfied by one available clerk. The latter need is satisfied by the availability of two shifts for each 24-hour period. The

County/City clerks are also assigned the responsibility of maintaining administrative records, e.g., inventory and cost records. This function can be performed by the individual responsible for logistical support.

15. A total of ten clerical personnel will be necessary each emergency shift -- two transportation specialists, two individuals to man telephones, one general clerk and five message center operators.

16. In Callaway County there is a County Clerk and twelve clerical positions occupied, serving a total of four county administrative offices. In addition, there is a County Assessor and his four clerks, who will perform the important function of ensuring transportation for those requiring assistance. Furthermore, there is a City Clerk and a City clerical staff of approximately ten. Accordingly, during both emergency shifts, no additional clerical individuals would be required to be available to provide assistance.

17. Finally, while I am confident that there will be sufficient clerical personnel available to perform their assigned tasks in the event of a radiological emergency at the Callaway Plant, the full scale exercise required by NRC to be

conducted prior to the plant's exceeding 5% power will ensure
that this is in fact the case.

Walter M. Clark
Walter M. Clark

Subscribed and sworn to before me
this 16 day of May, 1983.

Susan K. Salmons
Notary Public

My Commission expires SUSAN K. SALMONS
NOTARY PUBLIC, CALLAWAY CO., MO
MY COMMISSION EXPIRES 04-04-86

WALTER M. CLARK
Qualifications & Experience

Twenty four (24) years of employment with the State Emergency Management Agency and fifteen months (15) as Director of the Callaway County/Fulton Emergency Management Agency.

Started employment with Missouri Civil Defense Agency in November 1955. The name was later changed to Disaster Planning and Operations, Civil Defense and more recently changed to State Emergency Management Agency.

My first staff position title was Service Chief. Responsibilities included coordination of several programs including local emergency plan development, police reserve training, federal surplus property coordinator, and editor of monthly newsletter.

From 1962 to 1975 I held various positions in the state office including:

Chief, Resources Management Division
Plans and Operations Officer
Community Shelter Planning Officer

All required providing assistance in the development of state and local emergency operations plans and frequent public speaking. During disasters in the state I usually was delegated the additional duty of Disaster Coordinator for the office.

From December 1974 to January 1976 I was self-employed as a Governmental Programs Consultant, assisting counties, cities, and other units of local government with federally funded projects.

January 1976 to January 1981 - Rejoined the SEMA office and held the following positions:

Administrative Assistant
Nuclear Civil Protection Planner
Deputy Director

March 15, 1982 to present - Part time Emergency Management Director for Callaway County and City of Fulton

January 1, 1981 to present - Self-employed consultant

Professional Training

Law Enforcement - University of Missouri
Resources Management - DCPA Staff College
Radiological Instructor - University of Missouri
Community Shelter Planning - DCPA Staff College
Fallout Shelter Analysis - DCPA Staff College

Served on Callaway County R-III Board of Education for 11 years, 5 of which as President of Board. Developed the schools first "Board Policies Handbook" and "School Emergency Plan."