

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 3 AS TO WHICH THERE IS
NO GENUINE ISSUE TO BE HEARD
(STAFFING - EMERGENCY MANAGEMENT DIRECTOR)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 3 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Emergency Management Directors ("EMD's") of Montgomery, Osage and Gasconade Counties will be able to perform the responsibilities assigned to them in their respective county plans while holding the position of EMD on a part-time basis.

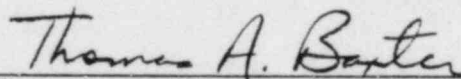
2. An alternate EMD has been identified in Montgomery County.

3. The Montgomery County EMD does not need to have additional secretarial support to perform his assigned responsibilities.

4. Since it will be tested in the Callaway Plant emergency exercise, the preference of the Montgomery County Court that the EMD fulfill the responsibilities of the Public Information Officer in the event of a radiological emergency at the Callaway Plant is a reasonable planning basis.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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