

May 14, 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) )

AFFIDAVIT OF TOM MITCHELL ON  
REED CONTENTION 3 (STAFFING - EMERGENCY  
MANAGEMENT DIRECTOR)

County of Montgomery )  
 ) ss.  
State of Missouri )

TOM MITCHELL, being duly sworn, deposes and says as follows:

1. I am the Emergency Management Director ("EMD") for Montgomery County. My business address is the Montgomery County Courthouse, Montgomery City, Missouri. I regularly work as an electrical maintenance mechanic in Montgomery County, in which I have been a resident for 37 years. 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 3 (Staffing - Emergency Management Director).

2. A portion of Montgomery County (approximately 56 square miles, in which approximately 500 people reside) is located in the Callaway Plant plume exposure pathway emergency planning zone ("EPZ").

3. In my capacity as the Montgomery County EMD, I have been working and will continue to work with Montgomery County government officials to ensure that they are satisfied with the Montgomery County Emergency Response Plan ("Montgomery Plan"). This is an ongoing process, involving numerous meetings with Montgomery County officials, State officials, officials from the other counties in the EPZ, and with representatives from Union Electric Company.

4. In Contention 3, Mr. Reed raises essentially four points, which I will address in turn. Those issues are: (1) a full-time Montgomery County EMD is necessary; (2) Montgomery County has no alternate EMD; (3) the Montgomery County EMD needs secretarial assistance; and, (4) the Montgomery County EMD has been assigned the duties of the Public Information Officer ("PIO"), which would conflict with his other duties during an emergency.

5. I disagree with Mr. Reed's assessment that a full-time EMD is presently necessary in Montgomery County. The technical expertise to which Mr. Reed refers in Contention 3 is not supposed to come from the EMD; rather, technically qualified individuals will be available to advise the Presiding Judge from the State and from Union Electric Company. For example, the Bureau of Radiological Health is responsible for answering our questions about radiological defense. In addition, in the event of a radiological emergency at the Callaway Plant, numerous technical experts from various federal agencies will be available to assist, as needed. The EMD is responsible for the development and coordination of the county's emergency preparedness program -- an effort which precedes any emergency. In addition, during an emergency, the EMD is available to the Presiding Judge to provide assistance and advice in coordinating the emergency response

effort. The specific tasks assigned to the EMD all relate to the practical aspects of implementation of the Montgomery Plan. These are not technical tasks. Rather, they depend upon the individual's familiarity with the Montgomery Plan, its relationship to the entire off-site emergency response effort, and the resources and unique problems of the county. Furthermore, to the extent the EMD needs to be familiar with any technical matters, he will receive specific training in these areas from the State of Missouri, supplemented as needed by Union Electric Company.

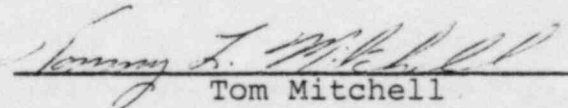
6. In my view, it has taken 20 hours of work each week over the past 1½ years to resolve the many issues involved in county radiological emergency preparedness. I have no reason to believe there will be any significant reduction in the amount of time required in the EMD duties once the county plan is in place. For example, just to read and comprehend the voluminous material received from State offices pertaining to emergency preparedness in given weeks would exceed 20 hours of reading and study. Furthermore, if there should be an actual emergency, the time demands would be greatly increased.

7. I believe that I am capable of serving as the Montgomery County EMD while holding this position on a part-time basis. While I have been very busy at times over the past 1½ years during my tenure as EMD, I have been able and will continue to be able to provide assistance to the County Court with respect to radiological emergency matters. I consider this a component of my civic responsibility and I serve with pride.

8. The Montgomery County Court has identified Mr. Vincent B. Eldringhoff as an alternate EMD.

9. I agree with Mr. Reed that the EMD will require some secretarial assistance, but only on a part-time basis. Thus far necessary assistance has been provided by my wife.

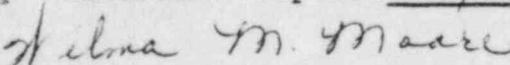
10. The Montgomery County Court is of the view that the PIO should be the EMD, because the EMD will be in the best position to know what is going on and, accordingly, will be able to provide the best information to the public. The Montgomery County PIO is only one of numerous public information officers who will be addressing concerns raised by the public in the event of a radiological emergency at the Callaway Plant. The Montgomery County PIO is intended to focus uniquely on information needed by Montgomery County residents. It is not the job of the Montgomery County PIO to brief the public generally about events at the Callaway Plant. It is the preference of the Montgomery County Court that the PIO remain the EMD at least through the first full-scale exercise which will precede operation of the Callaway Plant above 5% power. In the event the exercise establishes that the EMD will be overloaded if he assumes the responsibilities of the PIO, the County Court will reassign the duties of the PIO to another individual.

  
Tom Mitchell

Subscribed and sworn to before me

this 17 day of MAY, 1983.

My Commission expires 4-15-84.

  
Helma M. Moore  
Notary Public