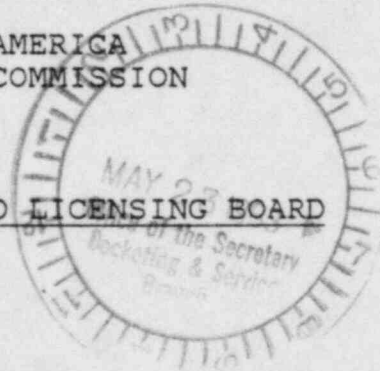


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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 HARVEY LALK
ON REED CONTENTION 3 (STAFFING -
EMERGENCY MANAGEMENT DIRECTOR)

County of Gasconade)
State of Missouri) ss.

HARVEY LALK, being duly sworn, deposes and says as follows:

1. I am the Emergency Management Director ("EMD") for Gasconade County. I am retired from full-time employment. I was born and raised in Gasconade County. I worked as a budget program analyst for the U.S. Government for 32 years, and returned to Gasconade County approximately 3-1/2 years ago. 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 Gasconade County (approximately 2 square miles, in which approximately 200 people reside) is located in the Callaway Plant plume exposure pathway emergency planning zone ("EPZ").

3. In my capacity as the Gasconade County EMD, I have been working and will continue to work with Gasconade County government officials to ensure that they are satisfied with the Gasconade Emergency Response Plan ("Gasconade Plan"). This is an ongoing process, involving numerous meetings with Gasconade 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 states that a full-time Gasconade County EMD is necessary.

5. I disagree with Mr. Reed's assessment that a full-time EMD is necessary in Gasconade 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 Gasconade Plan. These are not technical tasks. Rather, they depend upon the individual's familiarity with the Gasconade 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 will take approximately 10 to 20 hours of work each week to resolve the many issues involved in county emergency preparedness, of which radiological preparedness is one part. Once the plans are signed, I expect less of my time to be required to keep the plans current and resolve any issues which arise from time to time.

7. I believe that I am capable of serving as the Gasconade County EMD while holding this position on a part-time basis. While I have been busy at times during my tenure as EMD, I have been and will continue to be able to provide

assistance to the County Court with respect to radiological
emergency matters. I am proud to be able to assist the County
in this manner.

Harvey Lalk
Harvey Lalk

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

Carol J. Williams
Notary Public

My Commission expires Dec. 20, 1984.