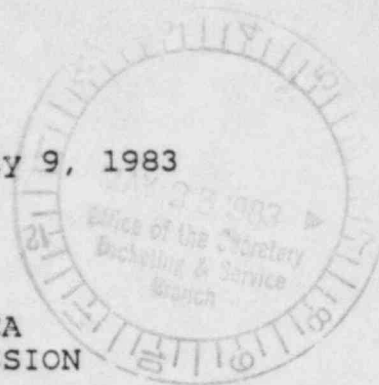


May 9, 1983

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 JIM CROWE
ON REED CONTENTION 3 (STAFFING -
EMERGENCY MANAGEMENT DIRECTOR)

County of Osage)
State of Missouri) ss.

JIM CROWE, being duly sworn, deposes and says as follows:

1. I am the Emergency Management Director ("EMD") for Osage County. My business address is the County Courthouse, Linn, Missouri. I regularly work as a Chief Deputy in Osage County, in which I have been a resident for 35 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 Osage County (approximately 72 square miles, in which approximately 860 people reside) is located in the Callaway Plant plume exposure pathway emergency planning zone ("EPZ").

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

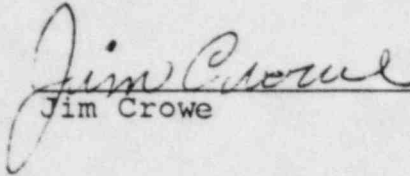
5. I disagree with Mr. Reed's assessment that a full-time EMD is necessary in Osage County. The technical expertise to which Mr. Reed refers in Contention 3 is not supposed to come from the EMD; rather, technically qualified individuals will be available to advise the Presiding Judge from the State and 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 Osage Plan. These are not technical tasks. Rather, they depend upon the individual's familiarity with the Osage 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.

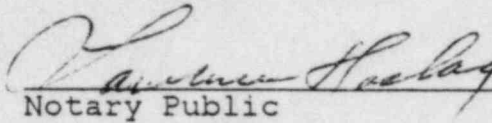
6. In my view, it has taken 10 hours of work each week over the past 5 years to resolve the many issues involved in county emergency preparedness of which radiological is one part. Once the plans are signed, I expect less of my time to be required to keep the Osage Plan current and resolve any issues which arise from time to time.

7. I believe that I am capable of serving as the Osage County EMD while holding this position on a part-time basis. While I have been very busy at times over the past 5 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. This is a civic responsibility which I proudly fulfill.


Jim Crowe

Subscribed and sworn to before me
this 12th day of May, 1983.


Notary Public

My Commission expires 3/19/85.