

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 AS TO WHICH THERE IS NO  
GENUINE ISSUE TO BE HEARD  
(CONTENTION 4)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of Reed Contention 4 (Emergency Action Level Scheme/Worker Notification), that there is no genuine issue to be heard with respect to the following material facts:

1. Annex C of the local plans includes an emergency classification system and action level scheme, consistent with Applicant's, and an identification of the emergency functions to be performed at each level.

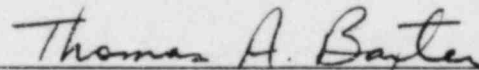
2. Other portions of the local plans establish concepts of operation and assign organizational responsibilities for each of the emergency functions delineated in Annex C.

3. Detailed implementing procedures, along with periodic training, exercises and drills, are capable of providing emergency workers with an adequate understanding of specifically how emergency tasks are implemented.

4. Annex D of the local plans establishes the means for emergency worker notification.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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