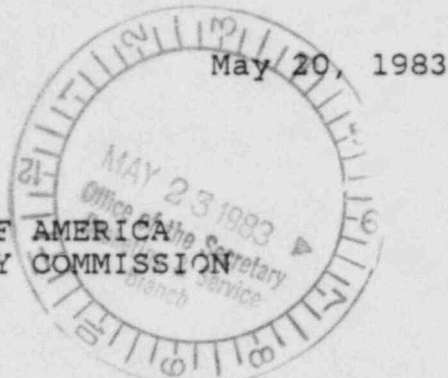


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



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 8 AS TO WHICH THERE IS
NO GENUINE ISSUE TO BE HEARD
(RADIATION DETECTION EQUIPMENT)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 8 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Radiation Management Corporation will provide a mobile whole body counter for use by the State of Missouri in the event the need arises to analyze biological uptake of radionuclides by emergency workers or members of the public as a result of an accident at the Callaway Plant.

2. Whole body counting need not be done immediately, but can be done days after an accident.

3. External exposure levels can be evaluated adequately either through excellent estimations of exposure levels based on the Union Electric Company and State of Missouri monitoring programs or through blood tests that can be given at any standard hospital laboratory.

4. More highly specialized tests for external exposure, if necessary at all, can be performed in the days and weeks following the accident.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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