

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  
ON REED CONTENTION 13 AS TO WHICH THERE IS  
NO GENUINE ISSUE TO BE HEARD  
(ORGANIZATIONS REQUIRING SOPs)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 13 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. There need not be separate implementing procedures for each county organization and suborganization assigned an operational role in the county radiological emergency response plans.

2. Functional procedures are an effective way of providing local organizations with detailed information about the

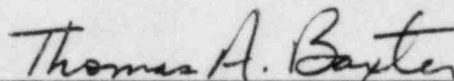
responsibilities assigned to them as well as to other organizations during a radiological emergency, while at the same time minimizing overlapping or redundant and hence, confusing procedures.

3. The plans for the four counties in the Callaway Plant plume exposure emergency planning zone specify those functional procedures which are necessary to implement the county plans.

4. Adequate procedures for implementing the four county plans will exist prior to operation of the Callaway Plant above 5% power.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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