

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 MOTION FOR SUMMARY
DISPOSITION OF REED CONTENTION 14
(INCORPORATED CITIES, TOWNS AND VILLAGES)

Pursuant to 10 C.F.R. § 2.749, Applicant moves the Atomic Safety and Licensing Board for summary disposition of Reed Contention 14. As grounds for its motion, Applicant asserts that there is no genuine issue of material fact to be heard with respect to Contention 14, and that Applicant is entitled to a decision in its favor on that contention as a matter of law.

This motion is supported by Applicant's Statement of Material Facts as to Which There is No Genuine Issue to be Heard (Contention 14), Applicant's Memorandum of Law in Support of Motions for Summary Disposition on Emergency Planning

Issues, the Callaway County/Fulton Radiological Emergency Response Plan, the Osage County Radiological Emergency Response Plan, the Gasconade County Radiological Emergency Response Plan, and the Montgomery County Radiological Emergency Response Plan, together with all pleadings and other papers in this proceeding.

I. Procedural Background

Reed Contention 14, entitled "Incorporated Cities, Towns and Villages," states as follows:

Incorporated cities/towns/villages (identified in 13.B, above) are not included in the response effort. Neither the proposed Offsite plan or the SOPs of the respective counties, impacted by the plant, contains information concerning alerting and notification of said cities/towns/villages (hereafter called towns), communications available for town use in a radiological emergency, transportation of residents, to include non-ambulatory individuals, or methods and means for their determination of the need for and/or implementation of radiological exposure controls as mandated by NUREG 0654, II, A2a nor is the legal basis for their exclusion from said plan and SOPs specified as required by NUREG 0654, II, A2b. The protection (to include evacuation) of citizens within the towns is the legal responsibility of the mayors and town councils of said towns. Assurance of the complete evacuation of the citizens in these towns is most rapidly performed by the mayors or members of the councils. If shelter is to be selected in lieu of evacuation, the assurance that proper protective measures have been implemented by all citizens is again best performed by the mayors or members of the councils. Since the town governments are responsible for the safety of their citizens in the same manner that county courts are

responsible for the safety of citizens in the unincorporated portions of their counties, failure to include emergency plans for the towns can result in delay in protective response. The use of local responses (included manpower) within said towns is essential if public health and safety is to be assured. Such resources are under the control of town governments.

Final Particularization of Reed's Amended Contentions 1, 2 and 3 (Oct. 1, 1982), at 35-36. The referenced incorporated cities, towns and villages from Contention 13.B are Mokane (in Callaway County), Chamois (in Osage County), Morrison and Gasconade (in Gasconade County), and Rhineland (in Montgomery County). Id. at 35. The Board admitted Reed Contention 14 over the Staff's objections. Memorandum and Order (Specification of Contentions), at 5 (Dec. 7, 1982).

II. Governing Legal Standards

The Commission's regulations governing the content of applications provide that an operating license applicant ". . . shall submit radiological emergency response plans of State and local governmental entities in the United States that are wholly or partially within the plume exposure pathway Emergency Planning Zone (EPZ), as well as the plans of State governments wholly or partially within the ingestion pathway EPZ." 10 C.F.R. § 50.33(g) (footnotes omitted). The Commission's regulatory standards for emergency response plans, in 10 C.F.R. § 50.47(b), address "State and local response organizations"

within the EPZ, "State and local staff," and "principal response organizations."

The planning standards and evaluation criteria provided by NRC and the Federal Emergency Management Agency ("FEMA")^{1/} on Assignment of Responsibility (Organizational Control (II.A)), begin as follows:

1.a. Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See Appendix 5).

b. Each organization and suborganization having an operational role shall specify its concept of operations, and its relationship to the total effort.

NUREG-0654 at 31. The remainder of the II.A criteria, including those cited in Reed Contention 14, build on and apply to these identified organizations which are intended to have an operational role.

The NRC/FEMA definitions of "principal organizations" and "suborganizations" address those which have some role (major, lead or supportive) in emergency planning or preparedness.

^{1/} NUREG-0654, FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." This document presents guidance for emergency plan review and approval. See Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1), LBP-81-59, 14 N.R.C. 1211, 1460 (1981), aff'd, ALAB-698, 16 N.R.C. ____, slip op. at 13-15 (Oct. 22, 1982).

NUREG-0654 at 5-1. The guidance observes that the assignment of roles, function and responsibilities ". . . is a matter that is best defined by the various parties involved in developing plans and preparedness for each nuclear site. Where the guidance in this document indicates a function that must be performed, emergency planners at all levels, must decide and agree among themselves, which organization is to perform such function." Id. at 5-2.

III. Argument

Since Reed Contention 14 was admitted, the plume exposure EPZ boundary has been modified and Gasconade (in Gasconade County) is no longer within the EPZ. See Attachment 1 hereto. The population of the remaining four incorporated cities/towns/villages which are the subject of this contention^{2/} is as follows:

Mokane	293
Chamois	546
Morrison	169
Rhineland	172

See Attachment 2 hereto (excerpt from 1980 Census).

Applicant admits and agrees with the first sentence of Reed Contention 14 -- i.e., that the above listed municipalities are not included in the response effort. This is not to

^{2/} The City of Fulton has a joint response plan with Callaway County.

say that the residents of those municipalities are not provided for in the off-site plans. In fact, those residents are a part of the plume exposure EPZ for the Callaway Plant, and their health and safety in a radiological emergency are provided for in the off-site plans, without distinction, in the same manner as are all other county residents of the EPZ.

The issue raised by Reed Contention 14 is whether or not the governments of these municipalities must be included in the off-site plans as response organizations. The Commission's regulations governing emergency plans do not state that all incorporated municipalities within the EPZ must be assigned the role of a response organization in the required off-site emergency plans. Rather, those regulations address "local response organizations" without specifying that they be county, municipal or township governments, or even that they be governments. See 10 C.F.R. § 50.47(b). Which local response organization is assigned tasks in the off-site plans is irrelevant to the NRC as long as the local emergency plans are adequate, and there is reasonable assurance that they can be implemented and that adequate protective measures can and will be taken in the event of a radiological emergency. See 10 C.F.R. § 50.47(a). The NRC/FEMA guidance, quoted above, extends this point by observing that it is up to the involved emergency planners to decide which organization is to perform a necessary function. See NUREG-0654 at 5-2.

Whether or not there are deficiencies in the emergency response plans for Callaway County/Fulton, Osage County, Gasconade County and Montgomery County presumably is a matter addressed by Mr. Reed's other contentions in this proceeding. Contention 14 does not in itself allege a planning deficiency. Instead, Mr. Reed has concocted a circular argument which asserts that these municipalities have legal responsibility for their citizens, that they can "best" or "most rapidly" perform certain functions, and that use should be made of local resources under the control of town governments.

Even assuming for the moment that each of the three prongs of Mr. Reed's argument is valid, the NRC cannot and should not reallocate local response organization assignments under the local response plans unless it is first determined that some substantive deficiency exists under the current allocation of responsibilities. Absent some deficiency, NRC should defer to the consensus decisions reached by local planners. An intervenor's view that another allocation might be better is irrelevant. Mr. Reed does not contend that the local plans will not work unless these municipal governments are included. During discovery, Applicant posed the following question to Mr. Reed:

71. Is Contention 14 based upon your view of the legal "chain of command" within the subject incorporated cities, towns and villages? If the contention is based to any extent on principles of sound emergency planning, specify the function(s) in the

emergency response plans for the Callaway Plant which can only be performed by the officials of the subject incorporated cities, towns, and villages, and in each case explain why the function cannot be fulfilled by others.3/

Mr. Reed's reply was as follows:

71. Sound emergency planning is based upon knowledge of what is to be done, the efficient performance of tasks involved, and an expeditious initiation and completion of protective measures. This is best accomplished by persons "on the scene" who have intimate knowledge of all of the job to be done and potential problems which may interfere with the mission. The Federal government understands this concept as it is manifested in all of its military and civil operations: proficiency at the lowest command echelon, including equipment and personnel. To place responsibility for a particular function on a person who is not immediately available to do that job presents a delay in the accomplishment of that function. While said non-resident person can fulfill the function, it does not make for an effective or efficient operation. It is not sound planning to build in a delay factor in an emergency response effort if it can be avoided.4/

Mr. Reed here concedes that a "non-resident" of the municipality can fulfill the emergency response functions in the off-site plans (even though municipal residents may participate in the response without municipal government involvement), and

3/ Applicant's Revised Interrogatories and Requests for Production of Documents of Intervenor John G. Reed, October 20, 1982.

4/ Reed's Response to Memorandum and Order Dated 09 December 1982, December 14, 1982.

does not identify a single example of a function which must be performed by these municipal governments.5/

In any case, each of the three prongs of Mr. Reed's argument in Contention 14 is faulty. Mr. Reed advances no authority for the proposition that as a matter of law the four subject municipal governments must be assigned an operational responsibility in the Callaway Plant off-site plans. He cites NUREG-0654 criterion II.A.2.b as requiring that the legal basis for excluding these municipal governments must be specified. In contrast, that criterion calls for an identification of the authorities for those response organizations included in the plans. Applicant need not present authority to exclude any local government; rather, Mr. Reed must present any legal authority which supports his thesis that they must be included. The guidance in NUREG-0654 is not that authority.6/ Further, this unsupported legal theory flies in the face of political facts. While a municipal government undeniably has some legal responsibilities for its electorate, it does not follow, as Mr.

5/ While the matter is not pivotal to this motion, it is not necessary for government officials to be "on the scene" immediately to implement protective actions for the residents of these towns. The notification and communications actions under the plans are not dependent upon personal appearances by government officials or emergency workers at the residences of the affected population.

6/ The other criterion cited in Contention 14 -- II.A.2.a -- merely requires the presentation of certain information for response organizations included in the plans.

Reed apparently reasons, that all responsibility for the health and welfare of those citizens rests with that level of government alone.

The second argument in Reed Contention 14 is that the mayors and town councils of these municipalities can "best" and "most rapidly" assure that protective actions (i.e., evacuation or sheltering) have been completed. There is no need, however, for government executives or legislators at any level to perform such verification functions. Plans for implementing protective actions for the general public are set forth clearly in the State and local plans. See, e.g., Annex I to local plans. Those plans call for law enforcement/security personnel assigned to patrol duty to insure that protective actions have been undertaken. See id. at TAB 3 and Applicant's Motion for Summary Disposition of Reed Contention 1 (on adequacy of law enforcement personnel resources).

Lastly, Mr. Reed argues that use should be made of local resources under the control of the town governments. In fact, the only such resources identified by Mr. Reed in either the contention or his responses to discovery requests are the persons of the mayors and town councils, who nevertheless are available in their personal capacities to participate in designated response organizations. The following exchange during discovery illustrates the point:

66. Specify the emergency response efforts of the cities listed in Contention 13.B which you believe should be delineated in SOPs.7/

66. All emergency response efforts that apply to counties and the City of Fulton should apply equally to the other incorporated towns that are wholly or partially within the 10 mile EPZ. Formal organizations are made up of people, it may be necessary to create such organizations if an effective emergency response effort is to be established.8/

70. What resources, either in equipment or personnel, of the governments of the subject incorporated cities, towns and villages, are required to implement the emergency response plans for the Callaway Plant?9/

70. The use of local personnel is required to effectively evacuate the citizens in and around population centers. The fact that such towns do not have the equipment or formal organizations to commit to the response effort is prime-facie evidence that they need to build a capability to protect their citizens in the event of an accident that involves the release of dangerous radio-nuclides. As towns or villages incorporated under Missouri State statute, they have a right to become involved in the planning effort.10/

In short, there are no resources of the subject four municipal governments which are necessary to implement the

7/ Applicant's Revised Interrogatories . . . , supra n.3.

8/ Reed's Response . . . , supra n.4.

9/ Applicant's Revised Interrogatories . . . , supra n.3.

10/ John G. Reed's Responses to Applicant's Revised Interrogatories, November 12, 1982.

off-site emergency response plans. Rather, Mr. Reed has attempted to create an artificial legal requirement for such involvement, which then would lead to the creation and equipping of new municipal government organizations -- all without a demonstrated deficiency in the capability to complete required tasks under existing plans.

In another proceeding, an intervenor claimed, on appeal, that the Licensing Board had erred in not finding that the City of San Juan Capistrano, which includes about one-half of the EPZ population, must be a "principal response organization" that must fulfill detailed emergency planning requirements. The Atomic Safety and Licensing Appeal Board rejected that argument, noting that "[t]he Commission's guidance recognizes that in any emergency planning zone there will be overlapping layers of government, and that these must be integrated into a cohesive emergency response." Southern California Edison Company, et al. (San Onofre Nuclear Generating Station, Units 2 and 3), ALAB-717, 17 N.R.C. ____, slip op. at 60 (March 4, 1983). Observing that the City of San Juan Capistrano does not itself have extensive resources that would be of use in an emergency, but that it has been integrated in the planning effort, the Appeal Board concluded:

It would be highly unusual for a governmental entity, bereft of extensive resources of its own, to be required to take a lead role in planning the response to a radiological emergency.

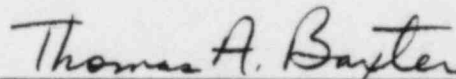
Id. at 61. Here, where the municipalities involved have no identified governmental resources and an insignificant portion of the EPZ population, the intervenor's position has even less merit.

IV. Conclusion

For all of the foregoing reasons, there is no genuine issue of material fact to be heard with respect to Contention 14, and Applicant is entitled to a decision in its favor on that contention as a matter of law.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



Thomas A. Baxter, P.C.
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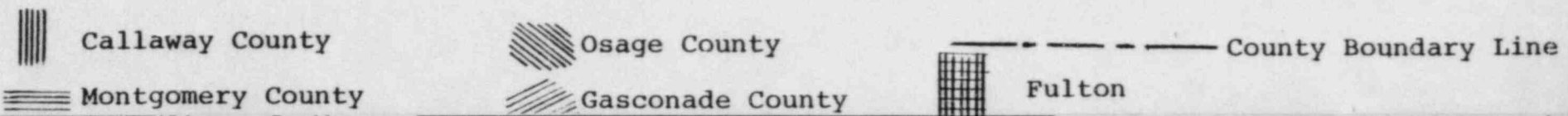
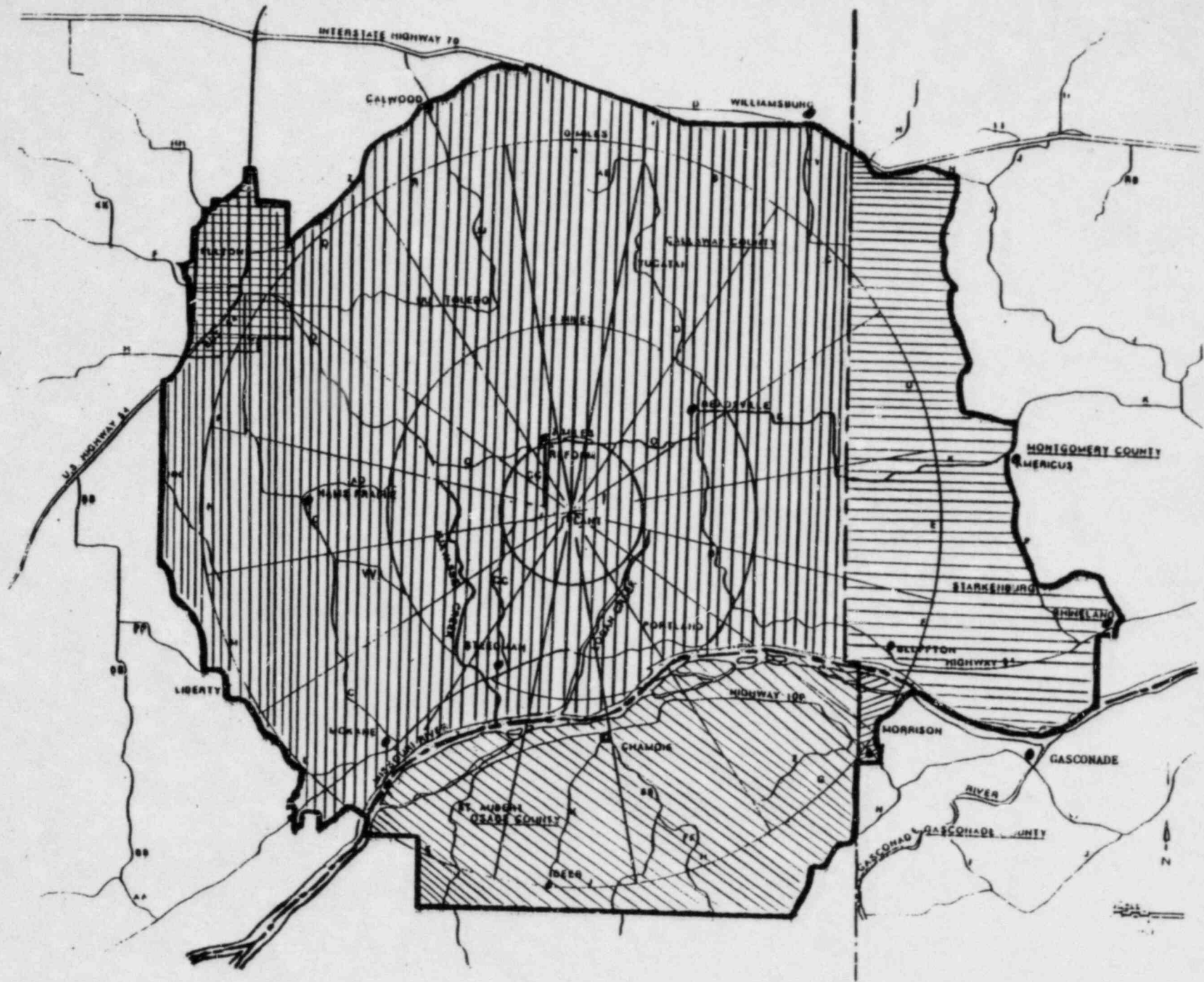
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May 20, 1983

EMERGENCY PLANNING ZONE (EPZ) BOUNDARY MAP



Number of Inhabitants

MISSOURI

1980

Census of Population

1980

Census of Population

VOLUME 1
CHARACTERISTICS OF THE POPULATION

CHAPTER A

Number of Inhabitants

PART 27

MISSOURI

PC80-1-A27

Issued February 1982



U.S. Department of Commerce
Malcolm Baldrige, Secretary
Joseph R. Wright, Jr.,
Deputy Secretary
Robert G. Dederick,
Assistant Secretary for
Economic Affairs

BUREAU OF THE CENSUS
Bruce Chapman,
Director

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[For changes in boundaries of incorporated places since 1970 see table 4. For meanings of symbols, see introduction.]

MISSOURI 27-2

Table 5. Population of Places: 1960 to 1980—Con.

(For changes in boundaries of incorporated places since 1970 see table 4. For meaning of symbols see introduction.)

Incorporated Places Census Designated Places	Counties				Incorporated Places Census Designated Places	Counties			
		1980	1970	1960			1980	1970	1960
Langston town	Perry	121	113	113	New Florence city	Montgomery	731	635	616
Lawrence village	Dallas	140	152		New Franklin city	Howard	1 228	1 122	1 096
Lawrence city	Ray	4 261	4 533	4 286	New Hampton city	Norman	358	327	299
Lawrence city	St. Clair	676	520	437	New Haven city	Franklin	1 581	1 474	1 223
Lawson town	Lincoln	130	126	157	New London city	Balls	1 161	967	875
Lawson town	Linn	178	175	235	New Madrid city	New Madrid	3 204	2 719	2 867
Lawson town	Monroe	50	68	75	New Mills village	St. Charles	224		
Lawson town	Clark	175	149	154	Newtown town	Newtown	168	208	153
Lebanon city	Boone	865	676	658	Newtown town	Sullivan	170	211	265
Lebanon city	Greene	139	203	206	Newport city	Webster	376	309	287
Lebanon village	St. Louis	186	224	283	New city	Christian	2 662	1 636	944
Lebanon town	Montgomery	87	101	97	New city	McDonald	1 161	924	736
Lebanon village	Camden	171	106	123	New city	Carroll	931	950	965
Lebanon city	Marion	5 680	5 301	4 547	New city	St. Louis	5 174	6 236	4 452
Lebanon city	Marion	656	540	528	New city	Clay	4 507	5 183	5 657
Lebanon city	Marion	415	319	427	New city	New Madrid	237	334	301
Lebanon city	Dunklin	6 096	5 374	5 007	New city	Pike	506	562	496
Lebanon city	Saline	297	342	338	New city	Pennsacola	184	157	
Lebanon city	St. Louis	6 191	5 031	2 021	New city	St. Louis	5 831	4 607	4 701
Lebanon city	Wright	1 423	1 056	949	New city	Phelps	135	138	183
Lebanon city	St. Louis	10 960	12 785	12 552	New city	Wright	291	294	263
Lebanon city	Boone	601	589	497	New city	St. Louis	881	358	186
Lebanon city	Lincoln	1 938	2 622	2 872	New city	Knas	187	156	176
Lebanon city	Lawrence	1 920	1 496	1 251	New city	Adair	676	547	621
Lebanon city	St. Louis	2 012	1 492	650					
Lebanon city	Saline	12 781	12 051	9 572					
Lebanon city	Webster	3 871	2 961	2 221					
Lebanon city	New Madrid	742	666	631					
Lebanon city	Warren	543	415	339					
Lebanon city	Audrain	309	318	330					
Lebanon city	Marion	64	39	79					
Lebanon city	St. Louis	5 676	8 805	7 807					
Lebanon city	Madison	9 558	9 910	7 807					
Lebanon city	New Madrid	547	538	450					
Lebanon city	De Kalb	1 187	1 045	942					
Lebanon city	Lafayette	291	330	270					
Lebanon city	Lincoln	416	409	447					
Lebanon city	Scotland	2 105	2 081	2 106					
Lebanon city	Chariton	252	289	287					
Lebanon city	Marion	442	364	368					
Lebanon city	Bates	85	64	76					
Lebanon city	Clay	336	387	360					
Lebanon city	Vernon	136	120	137					
Lebanon city	Audrain	12 276	11 807	12 689					
Lebanon city	Saline	177	205	156					
Lebanon city	Montgomery	268	235	211					
Lebanon city	Newtown	223	234	67					
Lebanon city	Sullivan	1 947	1 794	1 670					
Lebanon city	Barton	67	23	181					
Lebanon city	Adair	92							
Lebanon city	Lawrence	795	676	601					
Lebanon city	Wayne	257	207	226					
Lebanon city	Vernon	78	80	108					
Lebanon city	Barton	318	279	356					
Lebanon city	Scott	1 182	640	548					
Lebanon city	Washington	358	369	332					
Lebanon city	Clay	343	375	404					
Lebanon city	Boone	13 418	12 986	13 170					
Lebanon city	Calhoun	293	398	419					
Lebanon city	St. Louis	2 774	3 722	3 132					
Lebanon city	Total	6 148	5 937	5 359					
Lebanon city	Berry (pt. in)	4 367	4 225	4 115					
Lebanon city	Lawrence (pt. in)	1 781	1 712	1 244					
Lebanon city	Total	2 557	2 456	2 337					
Lebanon city	Marion (pt. in)	370	337	235					
Lebanon city	Marion (pt. in)	2 187	2 119	2 102					
Lebanon city	Montgomery	2 101	2 187	1 918					
Lebanon city	Lincoln	134	157	159					
Lebanon city	Henry	498	531	526					
Lebanon city	Linn	129	131	117					
Lebanon city	New Madrid	1 220	1 332	1 417					
Lebanon city	Scott	745	528	472					
Lebanon city	Gasconade	169	234	232					
Lebanon city	St. Louis	231	258	228					
Lebanon city	City	284	337	293					
Lebanon city	Lincoln	484	399	340					
Lebanon city	Hall	1 447	1 202	1 249					
Lebanon city	Vernon	149	149	136					
Lebanon city	Wright	3 974	3 377	3 176					
Lebanon city	Howard	1 664	1 320	936					
Lebanon city	Saline	131	139	147					
Lebanon city	Marion	162	165	225					
Lebanon city	Lawrence	3 341	2 600	2 381					
Lebanon city	Jefferson	8 121							
Lebanon city	Lafayette	271	263	215					
Lebanon city	Boone	402	586	499					
Lebanon city	Boone	151	114	110					
Lebanon city	Saline	474	381	385					
Lebanon city	Barton	248	230	245					
Lebanon city	Vernon	9 493	7 517	7 452					
Lebanon city	Knas	9 044	9 736	8 416					
Lebanon city	Calhoun	105	114	116					
Lebanon city	Phelps	519	427	359					
Lebanon city	Phelps	743	806	864					
Lebanon city	Macan	246	260	270					
Lebanon city	Montgomery								
Lebanon city	Howard								
Lebanon city	Norman								
Lebanon city	Franklin								
Lebanon city	Balls								
Lebanon city	New Madrid								
Lebanon city	St. Charles								
Lebanon city	Newtown								
Lebanon city	Sullivan								
Lebanon city	Webster								
Lebanon city	Christian								
Lebanon city	McDonald								
Lebanon city	Carroll								
Lebanon city	St. Louis								
Lebanon city	Clay								
Lebanon city	New Madrid								
Lebanon city	Pike								
Lebanon city	Pennsacola								
Lebanon city	St. Louis								
Lebanon city	Phelps								
Lebanon city	Wright								
Lebanon city	St. Louis								
Lebanon city	Knas								
Lebanon city	Adair								
Lebanon city	Total	4 067	2 025	1 100					
Lebanon city	Jackson (pt. in)	4 067	2 025	1 100					
Lebanon city	Lafayette (pt. in)								
Lebanon city	Franklin	386	340	341					
Lebanon city	St. Louis	1 728	1 609	1 552					
Lebanon city	Lincoln	143	156	139					
Lebanon city	Cape Girardeau	252	181	175					
Lebanon city	Clay	126	162	159					
Lebanon city	Clay	497	494	543					
Lebanon city	Clay	227	201	159					
Lebanon city	Clay	137	170	178					
Lebanon city	Clay	231	266	231					
Lebanon city	Lafayette	3 088	2 839	2 034					
Lebanon city	St. Charles	8 677	7 018	3 770					
Lebanon city	Cape Girardeau	80	77	75					
Lebanon city	Lincoln	272	330	290					
Lebanon city	Muller	128	151	135					
Lebanon city	St. Louis	8 039	9 156	8 257					
Lebanon city	Jefferson	774	799						
Lebanon city	Scott	1 266	1 226	1 090					
Lebanon city	Hall	901	789	887					
Lebanon city	Lincoln	525	492	513					
Lebanon city	Ray	922	883	800					
Lebanon city	Total	1 992	1 091	741					
Lebanon city	Camden (pt. in)	1 974	1 091	741					
Lebanon city	Muller (pt. in)	68							
Lebanon city	Total	381	338	274					
Lebanon city	Clayton (pt. in)	58	53						
Lebanon city	De Kalb (pt. in)	323	285	274					
Lebanon city	St. Clair	841	874	1 066					
Lebanon city	Sullivan	93	108	135					
Lebanon city	Casper	472	440	416					
Lebanon city	St. Louis	19 620	24 819	22 763					
Lebanon city	Gasconade	2 241	2 416	2 379					
Lebanon city	Christian	2 980	2 384	1 536					
Lebanon city	Total	4 410	3 247	2 745					
Lebanon city	Franklin (pt. in)	4 396	3 247	2 745					
Lebanon city	St. Louis	12							
Lebanon city	St. Louis	4 542	5 044	5 106					
Lebanon city	Marion	3 469	3 188	2 933					
Lebanon city	Marion	1 598	1 442	1 393					
Lebanon city	Jefferson	270	836	1 198					
Lebanon city	Pike	1 997	1 253	1 229					
Lebanon city	Franklin	254	233	222					
Lebanon city	New Madrid	1 081	1 051	1 060					
Lebanon city	Nodaway	223	232	260					
Lebanon city	St. Louis	1 221	1 337	1 315					
Lebanon city	St. Louis	531	760	680					
Lebanon city	Pennsacola	211	180	228					
Lebanon city	Bates	53	56	84					
Lebanon city	Donnell	502	540	753					
Lebanon city	Boone	85	90						
Lebanon city	Cass	1 571	705	458					
Lebanon city	St. Louis	79	51	99					
Lebanon city	Sheldahl	136							
Lebanon city	Balls	836	839	802					
Lebanon city	Perry	7 343	5 149	5 117					

Table 5. Population of Places: 1960 to 1980—Con.

[For changes in boundaries of incorporated places since 1970 see table 4. For meaning of symbols see introduction.][illegible]

NUMBER OF INHABITANTS