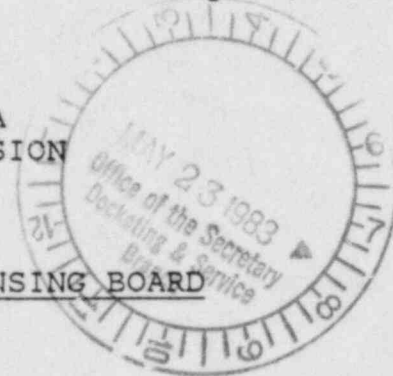


May 20, 1983

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 15 AS TO WHICH
THERE IS NO GENUINE ISSUE TO BE HEARD
(LETTERS OF AGREEMENT)

Pursuant to 10 CFR § 2.749(a), Applicant states, in support of its Motion for summary disposition of intervenor Reed's Contention 20 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Letters of agreement should be obtained by local governments for special services, not ordinarily provided by an organization to local residents, which are precipitated by the unique nature of a radiological emergency.

2. Letters of agreement need not be obtained by local governments from local government agencies assigned emergency

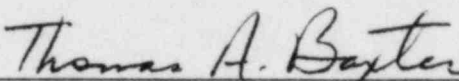
response functions in the local county plans or from local private organizations that would be called upon during an emergency for services which are regularly provided to residents through local government funds.

3. The provisions set forth in the letters of agreement obtained by the State of Missouri can be relied upon by the four counties in the Callaway Plant emergency planning zone and by the City of Fulton in the event of a radiological emergency at the Callaway Plant.

4. Those letters of agreement necessary to implement the four county radiological emergency response plans have been or will be obtained by the State and local governments.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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