

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 19 AS TO WHICH THERE
IS NO GENUINE ISSUE TO BE HEARD
(IMPEDIMENTS TO THE USE OF EVACUATION ROUTES)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 19 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. The impact of poor weather conditions on the passability of roads will be one factor in the State of Missouri's initial determination as to whether an evacuation should be ordered.

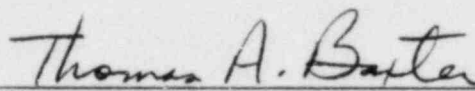
2. The likely impediments to evacuation in the four counties in the plume exposure EPZ have been identified.

3. Impediment removal resources have been identified and will be specified in the Impediment Removal implementing procedure for each of the county plans.

4. Adequate planning provisions have been made for removing impediments to evacuation.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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