

May 17, 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))

AFFIDAVIT OF ROBERT G. WRIGHT
ON REED CONTENTION 19
(IMPEDIMENTS TO THE USE OF EVACUATION ROUTES)

County of Callaway)
) ss.
State of Missouri)

ROBERT G. WRIGHT, being duly sworn, deposes and says as follows:

1. I am Associate Judge of the Administrative Court serving the Eastern District of Callaway County in the State of Missouri. My business address is the Callaway County Courthouse, Fulton, Missouri 65251. My District encompasses virtually all of the Callaway Plant emergency planning zone ("EPZ") within Callaway County. As a member of the Callaway County Court, I am responsible for county road and bridge maintenance throughout the County, along with my colleagues on the Court. The County road supervisor reports directly to the Court. I am a life-long resident of Callaway County, other than my 4 years of duty in the United States Navy. I have personal knowledge of the matters stated herein and to the best

of my knowledge believe them to be true and correct. I make this affidavit in response to Reed Contention 19 (Impediments to the Use of Evacuation Routes).

2. Reed Contention 19 asserts that the four county radiological emergency response plan and procedures fail to provide methods of identification of means of dealing with potential impediments to use of evacuation routes, and contingency measures for resolving such problems. The four county plan has been revised. Separate plans now exist for each of the four counties in the EPZ. In my view, the revised Callaway County/Fulton Emergency Response Plan adequately addresses these issues, given the potential for evacuation impediments in the County.

3. Within the Callaway portion of the EPZ are roads which are the responsibility of the State of Missouri, Callaway County, the City of Fulton or the Fulton Special Road District. (The Fulton Special Road District is a small area covering about nine sections of the northwest quadrant of the EPZ, approximately eight miles from the Callaway Plant.) All of these roads have been taken into consideration in the following assessment of evacuation impediments.

4. Based on a review of the roads in the County Road District, at this time, to my knowledge there are eleven residences located within the EPZ which could potentially be isolated, preventing normal evacuation during the course of extensive rainfall, with subsequent localized flooding. This takes into account areas of the County where the County roads could potentially be blocked in excess of four hours. The following table identifies these homes by section number and radial distance from the Callaway Plant site, consistent with the U.S. Geographic Survey Map.

TABLE OF POSSIBLE ISOLATED RESIDENCES

	<u>MAP LOCATION</u> <u>TOWNSHIP/RANGE</u>	<u>SECTION</u>	<u>RADIAL MILES</u> <u>AND DIRECTION</u> <u>FROM PLANT</u>	<u>LOCATION</u> <u>GENERAL DESCRIPTION</u>
1.	T46N, R7W	19	2.4, SE	Logan Creek Road
2.	T46N, R8W	25	2.8, SSE	Logan Creek Road
3.	T46N, R8W	27	3.0, SSW	Farley Valley
4.	T46N, R8W	35	3.4, SSW	Farley Valley
5.	T46N, R8W	34	3.4, SSW	Farley Valley
6.	T46N, R8W	17	3.3, WSW	Zimmerman Place
7.	T47N, R7W	24	8.8, NE	Ruga Property
8.	T47N, R7W	3	9.4, NE	Koupal Property
9-11.	T48N, R7W	30 (3 homes)	10.5, NW	Young and Bellamy Properties

5. In the event of excessive rainfall coincidental with an accident at the nuclear plant which would require evacuation, the Missouri State National Guard, which has helicopters available for its use, would be called upon and has agreed to evacuate these isolated residents. See attached Exhibit "A" (National Guard letter). None of the residences are located within two miles of the Callaway Plant. There are six residences located in the radius of two to five miles, and five residences located in excess of eight but less than eleven miles from the plant.


6. A second natural impediment which has been considered is that of an unusually heavy snowfall occurring coincidental with an emergency at the nuclear plant requiring evacuation. Experience has shown that in the event of a heavy snowfall, the County resources, which consist of eight graders and five trucks, can adequately clear the County roads in approximately 24 hours. Evacuation can begin as

soon as major roads are cleared, which takes about 8 hours, with the final road being cleared in 24 hours. If our effort is concentrated to the areas identified for evacuation, such as the two mile radius in all directions from the plant as well as a ninety degree sector for two to five miles from the plant, it is reasonable to conclude that adequate clearance for evacuation can be provided within two to four hours.

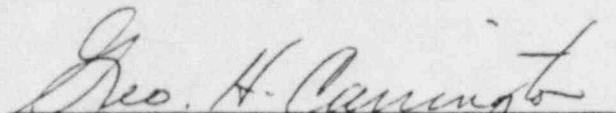
7. Under the conditions of a plant emergency, the full resources of the State Highway and Transportation Department become available and it is my conservative opinion that the entire County and State road system within the EPZ, including the Fulton Special Road District, can be completely cleared within eight hours, in the event of an unusually heavy snowfall. The State equipment which would become available for such emergency would be an additional 24 units of snow removal equipment. Again, if our effort is concentrated to the areas identified for evacuation, i.e., the two mile radius in all directions from the plant as well as a ninety degree sector for two to five miles from the Plant, adequate clearance can be provided within two hours.

8. Finally, man-made impediments to traffic flow will be noted by, or reported to, traffic control personnel who in turn will report such conditions to the Callaway County/Fulton EOC. Additional monitoring for impediments will be provided by State Civil Air Patrol. Removal of such impediments will be accomplished by State or County Highway personnel or through normal equipment resources available to the Sheriff/Chief of Police.

9. In conclusion, it is my view that the significant evacuation impediments have been identified, and the resources and planning effort necessary to overcome such impediments are available.


Robert G. Wright

Subscribed and sworn to before me this
17th day of May, 1983.


Geo. H. Carrington

Notary Public

Co. Clerk. Callaway Co.

My Commission expires 12-31-86.

DEPARTMENT OF PUBLIC SAFETY



HEADQUARTERS MISSOURI NATIONAL GUARD

Office of the Adjutant General
1717 Industrial Drive
Jefferson City, Missouri 65101
Phone 314 - 751-2321

January 6, 1983



Union Electric Company
Attention: Mr. M. A. Stiller
Post Office Box 620
Fulton, Missouri 65251

Dear Sir:

This correspondence is in regard to your letter, dated November 10, 1982, and in accordance with the Missouri Nuclear Accident Plan, dated June 1982.

Assumptions in the use of the Missouri National Guard are:

- a. Missouri National Guard personnel will not be assigned missions in areas where the possibility of dangerous levels of radiation exists.
- b. The Missouri National Guard will respond to a nuclear power plant emergency as declared by the Governor with available personnel and resources.
- c. That a civilian authority is designated as a point of contact prior to the National Guard being assigned a mission.
- d. That missions be assigned by civil authorities, but the execution to include the number of personnel and equipment to be used, will be determined by the Missouri National Guard.

The Missouri National Guard will provide support as follows:

- a. One hundred twenty Guardpersons will be available for traffic control and assist in local radiation survey. Personnel will be furnished from the following units:

Headquarters, Missouri Army National Guard (Jefferson City)

1175th Military Police Company (Boonville and Moberly)

Headquarters and Headquarters Battery, 1st Battalion, 128th Field Artillery (Columbia)

1035th Maintenance Company (Jefferson City)

Service Battery, 1st Battalion, 128th Field Artillery (Mexico)

Headquarters and Headquarters Detachment, 735th Maintenance
Battalion (Jefferson City)

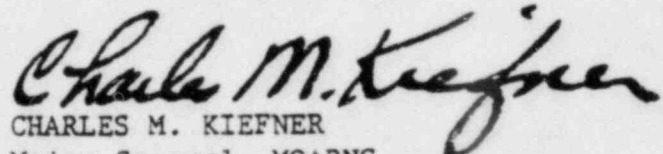
b. The expected response time for the designated units is six hours after the initial notification.

c. Guardpersons that would be used for surveying personnel and equipment for radioactive contamination to include themselves will receive initial training and annual refresher training.

d. Air Evacuation would be performed by helicopters from Jefferson City. Normally, during working hours reaction time to Readsville and Mineola would be two hours. During non-duty hours, response could be up to four hours.

The Missouri National Guard has been called to State Emergency Duty 22 times in the past five years. The response time was between four and six hours, primarily dependent on unit members traveling to Armories and preparing vehicles for Operations under adverse weather conditions.

Sincerely,


CHARLES M. KIEFNER
Major General, MOARNG
The Adjutant General