

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 HAROLD MATTHEWS  
ON REED CONTENTION 19  
(IMPEDIMENTS TO THE USE OF EVACUATION ROUTES)

County of Osage )  
State of Missouri ) ss.

HAROLD MATTHEWS, being duly sworn, deposes and says as follows:

1. I am Associate Judge of the Administrative Court serving the First District of Osage County in the State of Missouri. My business address is the Osage County Courthouse, Linn, Missouri. As a member of the Osage County Court, I am responsible for county road and bridge maintenance throughout the County, along with my colleagues on the Court. I am a life-long resident of Osage County. I have personal knowledge

of the matters stated herein and 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 emergency planning zone ("EPZ"). In my view, the revised Osage County Plan adequately addresses these issues, given the potential for evacuation impediments in the County.

3. Based on a review of all county roads located within the EPZ, I have concluded that there are no residences located within the EPZ that potentially could be isolated by localized flooding. This conclusion takes into account all areas where the roads could potentially be blocked in excess of four hours.

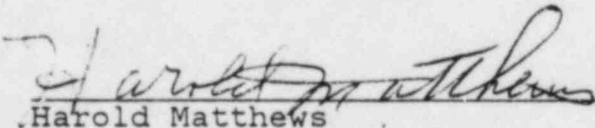
4. A second natural impediment which has been considered is that of an unusually heavy snowfall occurring coincidental with an emergency at the nuclear plant requiring evacuation. Within the Osage County portion of the EPZ, which is minimally in excess of five miles from the Callaway Plant, roads are the responsibility of either the State of Missouri, the County of Osage, or the Shawnee Creek Special Road District. In the event of a heavy snowfall, under most conditions the County

resources, which consist of 4 graders and 1 truck, and readily available State resources located in the County, which consist of 2 graders and 4 trucks, can adequately clear the State and County roads within the EPZ in approximately 6 hours.

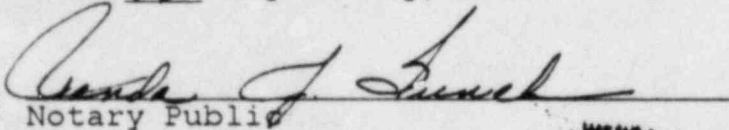
Evacuation can begin as soon as major roads are cleared, with the final road being cleared in 6 hours. If our effort is concentrated to isolated areas where plowing is necessary in order for certain families to evacuate, the time required will be proportionally reduced.

5. Finally, identification of 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 Osage County EOC. Additional monitoring for impediments will be provided by State Civil Air Patrol. Removal of such impediments will be completed by State or County Highway personnel or through normal equipment resources available to the Sheriff.

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

  
Harold Matthews

Subscribed and sworn to before me  
this 16 day of May, 1983.

  
Notary Public

My Commission expires

WANDA J. BUNCH  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES APR. 25, 1987  
OSAGE COUNTY