

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 20 AS TO WHICH THERE IS  
NO GENUINE ISSUE TO BE HEARD  
(AUTHORIZATION OF EXCESS RADIOLOGICAL  
EXPOSURES TO WORKERS & SPECIFICATION OF  
DECONTAMINATION ACTION LEVELS)

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

1. A clear decision chain for authorizing emergency workers to be exposed to radiation in excess of the Environmental Protection Agency's Protective Action Guides exists in the plans for each of the four counties located in

the Callaway Plant plume exposure pathway emergency planning zone.

2. The exposure levels which are applied in determining the need for authorizing excess exposures also are contained in the four county plans and are consistent with the PAG's established by the State of Missouri and set forth in the Missouri Nuclear Accident Plan - Callaway ("State Plan").

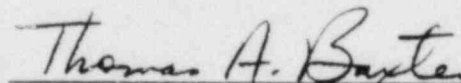
3. The process that would be followed to authorize exposures in excess of the PAG's is specifically delineated in the four county plans.

4. The Bureau of Radiological Health ("BRH") is responsible for determining the need for decontamination.

5. Decontamination action levels that will govern BRH's determinations about the need for decontamination are contained in the State Plan and in the four county plans.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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