

UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION  
 BEFORE THE  
 ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
U.S. DEPARTMENT OF ENERGY	)	Docket No. 50-537
PROJECT MANAGEMENT CORPORATION	)	
TENNESSEE VALLEY AUTHORITY	)	
	)	
(Clinch River Breeder Reactor Plant)	)	

APPLICANTS' STATEMENT OF MATERIAL FACTS  
 AS TO WHICH THERE IS NO GENUINE ISSUE TO BE HEARD

Pursuant to 10 C.F.R. §2.749(a), the United States Department of Energy and Project Management Corporation, for themselves and for the Tennessee Valley Authority (the Applicants) submit this statement of material facts as an annex to Applicants' Motion for Summary Disposition on Intervenor's Contention 9(g).

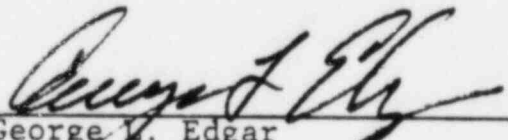
1. Intervenor's Contention 9(g) alleges:


Neither Applicants nor Staff have demonstrated that Applicants' plans for coping with emergencies are adequate to meet NRC requirements.

- (g) Applicants and Staff have failed to provide adequate assurance that the proposed emergency plans will meet the requirements and standards of 10 CFR 50.47(b).

2. Contention 9(g) raises no genuine issues of material fact, but rather raises only legal issues. See Response of Intervenor to NRC Staff First Set of Construction Permit Interrogatories and Requests for Admissions to Natural Resources Defense Council, Inc. and the Sierra Club Concerning Contention 9 (Emergency Preparedness) at 12 and 24.

Respectfully submitted,

  
George V. Edgar  
Attorney for Project  
Management Corporation

  
William D. Luck  
Attorney for the  
U.S. Department of Energy

Dated: May 19, 1983

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Docket No. 50-537

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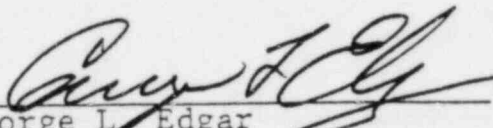
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