

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

MISSOURI COALITION FOR)
THE ENVIRONMENT, INC.)

Petitioner,)

v.)

Case No. 15-1114

UNITED STATES NUCLEAR)
REGULATORY COMMISSION and the)
UNITED STATES OF AMERICA,)

Respondents.)

**UNOPPOSED MOTION OF UNION ELECTRIC COMPANY,
DBA AMEREN MISSOURI, FOR LEAVE TO INTERVENE**

Union Electric Company, dba Ameren Missouri (“Ameren”), respectfully moves, pursuant to 28 U.S.C. § 2348, Rule 15(d) of the Federal Rules of Appellate Procedure, and DC Circuit Rule 15(b), for intervention as of right in the above-captioned proceeding as a respondent in support of the agency decisions identified in the Petition for Review filed by the Missouri Coalition for the Environment (“Missouri Coalition”) in Case. No 15-1114.¹ In support of this motion, Ameren states the following:

¹ Missouri Coalition Petition for Review, Missouri Coalition for the Environment v. United States Nuclear Regulation Commission, No. 15-1114 (Apr. 23, 2015).

Ameren holds the operating license issued by the Nuclear Regulatory Commission (“NRC”) for the Callaway Nuclear Power Plant, Unit 1 (“Callaway”), which is located in Callaway County, Missouri. Ameren is the licensed owner and operator of Callaway.

Ameren is entitled to intervene as a matter of right in this action because Ameren was a party in interest in the proceeding before the NRC that is the subject of the Petition for Review. In December 2011, Ameren applied to the NRC to renew the operating license of Callaway for an additional twenty year period. Ameren fully participated in the NRC license renewal proceeding for Callaway, in which the NRC ultimately granted Ameren’s application and on March 6, 2015, issued Renewed Facility Operating License No. NPF-30 for Callaway. That issuance and related orders are the subject of the instant Petition for Review.

The renewed NRC operating license for Callaway authorizes Ameren to continue to operate Callaway for twenty years beyond its initial operating license expiration date, which is October 18, 2024. Ameren derives financial benefit from the generation and sale of electricity from Callaway. The renewed operating license is necessary for Ameren to receive financial benefit from the continued operation of Callaway throughout the twenty year license renewal period, as well as other expected benefits. Therefore, Ameren’s interests would be adversely

affected if the NRC's issuance identified in the Petition for Review were enjoined, set aside, or suspended. 28 U.S.C. § 2348.

Thus, Ameren has substantial, direct, and tangible interests in this Court's affirmation of the NRC issuance and orders challenged by the Petition for Judicial Review. Accordingly, Ameren is entitled to intervene as of right in this action. 28 U.S.C. § 2348. Further, counsel for Ameren has been authorized by counsel for the Nuclear Regulatory Commission and counsel for the Missouri Coalition to represent that they do not oppose Ameren's intervention in this proceeding.

Respectfully submitted,

Dated: April 30, 2015

/s/ David R. Lewis
David R. Lewis
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street, N.W.
Washington, DC 20036
(202) 663-8474
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,
dba Ameren Missouri

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

MISSOURI COALITION FOR)
 THE ENVIRONMENT, INC.)
)
 Petitioner,)
)
 v.)
)
 UNITED STATES NUCLEAR)
 REGULATORY COMMISSION and the)
 UNITED STATES OF AMERICA,)
)
 Respondents.)
)

Case No. 15-1114

**ADDENDUM TO UNOPPOSED MOTION FOR LEAVE TO INTERVENE
CERTIFICATE AS TO PARTIES, RULINGS, AND RELATED CASES**

Pursuant to D.C. Circuit Rule 27(a)(4), counsel for Union Electric Company, dba Ameren Missouri (“Ameren”), certifies as follows:

1. Parties, Intervenors, and Amici.

All parties, intervenors and amici appearing in this court are listed in the Petition for Review for Petitioner Missouri Coalition.

2. Rulings Under Review.

References to the rulings at issue appear in the Petition for Review for Petitioner Missouri Coalition.

3. Related Cases.

This case is related to State of New York v. NRC, Nos. 14-1210, 14-1212, 14-1216, and 14-1217 (Consolidated), which involves judicial review of the NRC's Continued Storage of Spent Nuclear Fuel Rule, 70 Fed. Reg. 56,238 (Sept. 19, 2014), and the NRC's Generic Environmental Impact Statement for the Continued Storage of Spent Nuclear Fuel, 70 Fed. Reg. 56,263 (Sept. 19, 2014).

Respectfully submitted,

/s/ David R. Lewis

Dated: April 30, 2015

David R. Lewis
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street, N.W.
Washington, DC 20036
(202) 663-8474
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,
dba Ameren Missouri

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

MISSOURI COALITION FOR)
 THE ENVIRONMENT, INC.)
)
 Petitioner,)
)
 v.)
)
 UNITED STATES NUCLEAR)
 REGULATORY COMMISSION and the)
 UNITED STATES OF AMERICA,)
)
 Respondents.)
)

Case No. 15-1114

**ADDENDUM TO UNOPPOSED MOTION FOR LEAVE TO INTERVENE
CORPORATE DISCLOSURE STATEMENT OF
UNION ELECTRIC COMPANY, DBA AMEREN MISSOURI**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and D.C. Circuit Rule 26.1, Union Electric Company, dba Ameren Missouri, submits this Corporate Disclosure Statement.

Union Electric Company, dba Ameren Missouri, is a Missouri corporation supplying electric and natural gas service to central and eastern Missouri. Union Electric Company owns and operates the Callaway Nuclear Power Plant, Unit 1.

Union Electric Company is a wholly owned subsidiary of Ameren Corporation. No other publicly held company has 10 percent or more equity interest in Union Electric Company.

Dated: April 30, 2015

/s/ David R. Lewis

David R. Lewis
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street N.W.
Washington, DC 20036
(202) 663-8474
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,
dba Ameren Missouri

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2015, the foregoing (1) Unopposed Motion of Union Electric Company, dba Ameren Missouri, for Leave to Intervene; (2) Certificate as to Parties, Rulings, and Cases; and (3) Corporate Disclosure Statement of Union Electric Company, dba Ameren Missouri; were served via the D.C. Circuit's Case Management/Electronic Case Files system. In addition, copies of the foregoing were also served by deposit in the U.S. mail, first class, postage prepaid, and by electronic mail, on the persons listed below, this 30th day of April, 2015.

Andrew Averbach, Solicitor
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Mail Stop O-15D21
11555 Rockville Pike
Rockville, MD 20852-2738
Andrew.averbach@nrc.gov

Diane Curran
Harmon, Curran, Spielberg, &
Eisenberg, L.L.P.
1726 M Street N.W., Suite 600
Washington, D.C. 20036
dcurran@harmoncurran.com

Michelle Dara Albert
U.S. Nuclear Regulatory Commission
Office of the General Counsel
Mail Stop O-15D21
11555 Rockville Pike
Rockville, MD 20852-2738
Email: Michelle.Albert@nrc.gov

Mindy Goldstein
Turner Environmental Law Clinic
Emory Law School
1301 Clifton Road
Atlanta, GA 30322
magolds@emory.edu

John E. Arbab
Environmental & Natural Resources
Division,
Appellate Section
United States Department of Justice
Patrick Henry Building, Room 2121
601 D Street, N.W.
Washington, D.C. 20004
john.arbab@usdoj.gov

Dated: April 30, 2015

/s/ David R. Lewis
David R. Lewis
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street N.W.
Washington, DC 20036
(202) 663-8474
david.lewis@pillsburylaw.com

Counsel for Union Electric Company,
dba Ameren Missouri