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MISSOURI-KANSAS SECTION: AMERICAN NUCLEAR SOCIETY



January 28, 1981



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Service Branch

Reference: Petition to Intervene Filed by Missouri-Kansas Section,
American Nuclear Society in the Matter of Union Electric
Company, Docket Number STN 50-483

Dear Sirs:

On behalf of the Missouri-Kansas Section of the American Nuclear Society, I wish to thank the Commission for the opportunity to restate the position of our organization in the referenced hearings since our request to intervene was denied on 1/12/81.

After reviewing 10 C.F.R. §2.714 and reassessing our position in these hearings, it seems more appropriate for the Missouri-Kansas Section to not intervene in these hearings. However, the Missouri-Kansas Section is hereby requesting that we be allowed "special limited appearances" to present technical information on contentions raised in these hearings. The justification for this request is given below.

As established in 10 C.F.R. §2.714 it appears that the Missouri-Kansas Section of the American Nuclear Society would meet all the requirements for intervention. The interest of the members of this Section are in 1) providing adequate electricity for the state of Missouri and its surrounding area, 2) providing for a viable economy in the Missouri area (which is largely a function of the adequacy of electricity and other energy sources) and 3) providing jobs in industry and education relating to nuclear energy and other energy resources. It is the opinion of members of the Section that the Callaway plant is vital to these interests.

These interests will be affected by the timely licensing of the Callaway plant. Members of the Section are residents in the Missouri area and their electrical energy is supplied by the electrical grid to which the Callaway plant will be connected. A report by the National Electric Reliability Council indicates that both the Mid-American Inter-pool and the Southwest Power Pool (which service the Missouri area) could experience marginal reserve margins by the mid-1980's even if the Callaway plant is brought on-line as scheduled. As consumers of electricity in this area, members of the Section will be affected. Additionally, the Missouri area is currently experiencing slowed economic growth rates, tax

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ACKNOWLEDGED BY JARD 2/4/81

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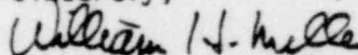
revenues are down, and the Governor is requesting curtailments in spending for services such as mental health, education, etc. This affects the quality of life for members of the Section and directly impacts on the professions of some who work either for the University of Missouri or for the State. Again, adequate supplies of energy are directly related to economic growth and the Callaway plant is part of this supply of energy. Finally, members of the Section work for a variety of institutions (i.e. Black and Veatch, consulting engineers in the energy field; Westinghouse, manufactures of the NSSS at Callaway; the University of Missouri-Columbia and University of Missouri-Rolla, etc.) whose professions would be affected by the economic loss that would result from less than timely licensing and operation of the Callaway I Unit. As a State employee I would be directly affected by economic losses resulting from a delay in the licensing of the Callaway power plant.

Finally, 10 C.F.R. §2.714 requests that petitioners state the specific aspect or aspects of the subject matter of the proceeding as to which the petitioner seeks to intervene. As technical people who have studied nuclear power and energy resources in general and who are familiar with the design, economics, environmental impact, safety, etc. of the Callaway plant, the Section's contention is that the Callaway plant be licensed because it is needed, is economical and is safe. However, the very fact that these hearings are being conducted verifies that this contention has been made by other parties involved. To restate this contention by the Missouri-Kansas Section as interveners would unnecessarily add to the work load of the Commission in hearings which are already besieged by numerous other contentions.

Therefore, the Missouri-Kansas Section respectively requests that we be allowed the opportunity to appear in special limited appearances when both the Commission and the Section feel it would be beneficial. Members of the Section have a wide variety of expertise in these areas as was indicated by the resumes of Dr. William H. Miller and Dr. Walter Meyer attached to the original petition. We would therefore like to await the emergence of contentions and be allowed to address those issues in which we have expertise and in which the Commission would desire expert testimony.

As Vice-Chairman, Chairman Elect of the Missouri-Kansas Section of the American Nuclear Society, I, William H. Miller, will act as representative of the Section in these proceedings.

Sincerely,



William H. Miller

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cc: Dr. Larry Drbal, Chairman