

UNION ELECTRIC COMPANY
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September 23, 1980

JOHN K. BRYAN
VICE PRESIDENT

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Mr. Harold R. Denton
Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

UI RC-391

Dear Mr. Denton:

NUREG-0696, "FUNCTIONAL CRITERIA FOR EMERGENCY RESPONSE FACILITIES"

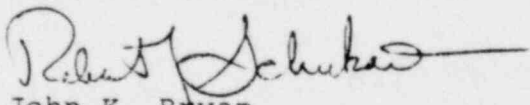
Union Electric Company has reviewed the subject NRC document concerning Emergency Response Facilities and offers the following comments.

a. In discussing the Nuclear Data Link System (page 3 of the subject report), there appears to be some uncertainty on whether "certain key decisions" will be made by the Regional Director on the Executive Management Team Director. The NRC should issue clear guidelines on the designation of the individual who will issue instructions to the operator to avoid confusion in the event of Emergency Response Facility activation.

b. The NRC indicates that it "may direct that certain operations be performed at the nuclear facility". This statement has tremendous financial and responsibility ramifications with respect to Union Electric. We do not deny the NRC's right to direct certain events, i.e. that the plant be shut down, but do not believe that the NRC should be able to direct the detailed procedures for accomplishing the event.

c. In describing verification and validation criteria, the NRC identifies that detail performance specifications may be derived at a later date and that a schedule for implementation will be provided separately. Union Electric finds it impossible to direct the work and plan for these new requirements without explicit direction at this time. We believe that there has been sufficient time to define the requirements and, if not, we believe that the Callaway Plant should be exempt from such requirements if and when they are derived by the NRC.

Very truly yours,


for John K. Bryan

ACP/sla
cc: N. A. Petrick
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ADD: SRAMOS L/E