UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNION ELECTRIC COMPANY

(Callaway Plant, Units 1 and 2)

Docket Nos. STN 50-483

STN 50-486

PETITIONER REPLY TO THE RESPONSE OF THE NRC STAFF TO PETITION FILED BY JOHN G. REED

Petitioner concurs with Staff findings that original petition of the undersigned, docketed by the Docketing and Service Branch on 10 September 1980, fails to meet the requirements of 10 CFR 2.714 and does contain other discrepancies identified by Staff Counsel.

Original petition was submitted without knowledge of 10 CFR requirements, nor details of Union Electric's amended application for the issuance of an operating license. Mr. Reed, now, feels that he can satisfactorily meet the requirements of 10 CFR 2.714 if permitted to renew and resubmit his petition.

In view of the Staff Counsel's recommendation that petitioner be afforded the opportunity to renew and refile its petition, the undersigned has begun drafting such a document. Resubmission of said document being dependent upon the decision of the board which will rule upon this matter.

DS03/1

Petitioner has requested copies of the following court rulings or board findings:

Portland General Electric Co. (Pebble Springs Nuclear Plant, Units 1 & 2), CLI-76-27, 4 NRC 610 (1976).

Wisconsin Public Service Corporation, et al. (Kewaunee Nuclear Power Plant), LBP 78-24, 8 NRC 78, 82 (1978).

Documents were referenced in Staff Response, identified above, but were not found in Local Public Document Room, Fulton Library, Fulton, Missouri. Request for above documents has been made to LPDR, Division of Rules and Records, Office of Administration, U.S. NRC, Wash., D.C. ATTN: Jona Souder, LPDR Coordinator. Information contained in these rulings may have impact upon refile of petition. Mr. Reed, requests such assistance as may be appropriate to expedite delivery of above information.

Respectfully submitted,

John G. Reed

Citizen of the United States

of America

Dated at Kingdom City, Missouri this O2nd day of October 1980.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Petitioner Reply to the Response of the NRC Staff to Petition Filed by John G. Reed" were served this O3rd day of October, 1980, by deposit in the U.S. mail, first class postage prepaid, upon the following:

Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Docketing and Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Roy P. Lessy, Jr., Esquire Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Gerald Charnoff, Esq.
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Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

John G. Reed

Citizen of the United States

of America