

October 2, 1981

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
UNION ELECTRIC COMPANY ) Docket No. STN 50-483 OL  
 )  
(Callaway Plant, Unit 1) )

APPLICANT'S MOTION FOR SUMMARY  
DISPOSITION OF JOINT INTERVENORS'  
CONTENTION NO. I.D (CONCRETE COVER)

Union Electric Company ("Applicant") hereby moves the Atomic Safety and Licensing Board, pursuant to 10 C.F.R. § 2.749, for summary disposition in Applicant's favor of part I.D., entitled "Concrete Cover," of Joint Intervenors' Contention No. 1.

As grounds for this motion, Applicant states that there is no genuine issue as to any fact material to Contention I.D, and that Applicant is entitled to a decision in its favor on Contention I.D as a matter of law.

This motion is based upon Applicant's Brief in Support, Applicant's Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard, the Affidavit of Subir K. Sen, and the Affidavit of R. David Neal, all submitted herewith.

Respectfully submitted,  
SHAW, PITTMAN, POTTS & TROWBRIDGE

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