

September 7, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of )  
 )  
UNION ELECTRIC COMPANY )  
 )  
(Callaway Plant, Unit 1) )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
Docket No. STN 50-483 OL

APPLICANT'S AMENDMENT TO ITS RESPONSE  
TO FINAL PARTICULARIZATION OF REED'S  
CONTENTIONS 1, 2, AND 3

On July 14, 1982, Applicant Union Electric Company submitted its Response to intervenor John G. Reed's "Final Particularization of Reed's Contentions 1, 2, and 3." In reviewing its Response, Applicant has determined that it inadvertently responded twice to one of Mr. Reed's contentions, proposed contention 1(d), thereby omitting any response to proposed contention 1(c), which has two subparts, (1) and (2). See Applicant's Response to Final Particularization of Reed's Contentions 1, 2, and 3, dated July 14, 1982, at 12-13. Applicant therefore asks the Board to accept the following addition to its Response, which addresses Mr. Reed's proposed contentions 1(c)(1) and 1(c)(2).

Proposed contention 1(c)(1) is entirely duplicative of proposed contention 1(f)(1), concerning the adequacy of communications facilities, proposed contention 1(h)(2), concerning radiation protection and communications equipment, proposed contention 1(i)(2), concerning protective equipment for emergency workers, proposed contention 1(o), concerning radiological training, and

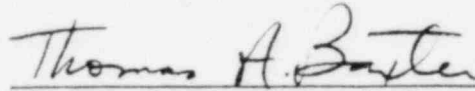
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proposed contention 2, concerning funding. Accordingly, proposed contention 1(c)(1) should be rejected.

Proposed contention 1(c)(2) asserts that dedicated communications facilities for each local government agent at the EOF must exist for that agent's use in contacting his local EOC. Applicant does not object to this contention.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicant's Amendment to Its Response to Final Particularization of Reed's Contentions 1, 2, and 3" were served this 7th day of September, 1982, by deposit in the U.S. mail, first class, postage prepaid, to the parties identified on the attached Service List.

Thomas A. Baxter  
Thomas A. Baxter, P.C.

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