

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket No. STN 50-483'82 DEC 17 A11:08

DOCKETED  
USNRC

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

REED'S RESPONSE TO MEMORANDUM  
AND ORDER DATED 09 DECEMBER 1982

On 13 December 1982, at or about 13:30 hours, the undersigned received the memorandum and order identified above which required Mr. Reed to answer Applicant's interrogatories within ten (10) days.

The following answers are submitted and while some may appear to be extremely concise, it is not the intent of the undersigned to withhold information from the Applicant; such brevity is the result of Mr. Reed's attempt to answer a specific question in the most direct manner possible.

Responses are numbered in the same manner as the interrogatories were posed.

ANSWERS

4. None.

5. No.

20. None.

21. No.

29. None.

30. No.

33. Such depends upon the individual's experience, technical knowledge, physical abilities and upon the seriousness of "an emergency" (see your 33 which does not define the scope of the term "an emergency"). I believe the job requires 40 hours a week for the lifetime of the plant. This is a

personal judgement based upon two (2) years experience as an EMD.

36. I have made no study of the probability of occurrence of any natural disaster and therefore am unable to identify what kind of disaster you make reference to in your interrogatory. Without such information, I am unable to answer your question.

41. I have not, at this time, made an attempt to resolve the many problems in the county SOPs. My study simply involved the identification of inconsistencies of each plan/SOP. I cannot answer this question.

44. Contention #6 clearly identifies the regulatory basis for the use of KI and further identifies planning procedures which place the public health and safety in jeopardy. I cannot explain why the State of Missouri feels that distribution of KI is not in the public interest, since it's plans are what prevents effective shelter on a prolonged basis. I can neither agree or disagree with negatives advanced in "Applicant's Response of Specified Reed Interrogatories Served on the Callaway Court Administrative Judges and Emergency Management Coordinator", since such is based upon low level releases and there is contention within the medical field as regards danger of low level radiation exposures; however, it must be noted that the Applicant cannot guarantee any specific quantity of radioactive nuclides will be present at any specific location during or after a release of nuclides from the plant in the event of an accident. I believe that the absence of such guarantees is what prompted the NRC to establish the requirements for radiological emergency response planning. Thus, failure to meet established standards is in opposition to Commission rules and regulations and my agreement or disagreement is meaningless.

58. Hospital space may be defined as beds, or other living space in which patients or potential patients may be located prior to, during, and immediately after medical surveillance or treatment. Resources are the facilities and equipment used to treat said patients or potential patients, to include medical personnel who use the equipment and any medical supplies required.

59. The "potential volume of patients" is an undetermined number of individuals who reside in a plume pathway. It has the minimum numerical of 1 and a maximum numerical value of the entire population in any one plume exposure pathway or a combination of several or all of the plume exposure pathways. It depends on the situation at the time; weather, wind speed and direction, magnitude of release, effectiveness of response effort, etc.

60. I don't know, I have not made a study of how many beds are or will be vacant now or at some future unspecified date; however, such a study should be made if sound emergency planning techniques are used.

66. All emergency response efforts that apply to counties and the City of Fulton should apply equally to the other incorporated towns that are wholly or partially within the 1 1/2 mile EPZ. Formal organizations are made up of people, it may be necessary to create such organizations if an effective emergency response effort is to be established.

67. Sirens only indicate that an emergency exists, it does not give information relating to actions to be taken. Without local control of a response effort, communications gaps exist in assuring that proper actions have been taken, timeliness of the response effort is delayed, local problems will not be resolved because they have not been anticipated by

county officials who will or may be involved in the larger picture. An emergency response effort is most effective when handled at the lowest echelon of command. If this were not so, all emergency planning would be handled at the Federal level where the resources and organizations are the most abundant. Consolidation of authority makes for simple plans, not effective plans.

71. Sound emergency planning is based upon knowledge of what is to be done, the efficient performance of tasks involved, and an expeditious initiation and completion of protective measures. This is best accomplished by persons "on the scene" who have intimate knowledge of all of the job to be done and potential problems which may interfere with the mission. The Federal government understands this concept as it is manifested in all of its military and civil operations: proficiency at the lowest command echelon, including equipment and personnel. To place responsibility for a particular function on a person who is not immediately available to do that job presents a delay in the accomplishment of that function. While said non-resident person can fulfill the function, it does not make for an effective or efficient operation. It is not sound planning to build in a delay factor in an emergency response effort if it can be avoided.

74. Until a person accepts a task, the assumption that he or she will perform same is self delusion and not a basis for sound planning that will ensure public health and safety. Whether or not a person actually will hazard his or her health in an emergency effort cannot be determined by a letter of agreement; the oath taken upon entry into the military is no valid assurance that an individual will perform under fire. The oath is

accepted as tentative assurance of such performance and in the case of radiological emergency response planning, the letter of agreement will serve as "reasonable assurance" that the individual will perform. To assume such performance without some record of individuals having agreed to do specific functions is not sound emergency planning, it is self-delusion on the part of an incompetent planner.

75. No one is currently forcing assignments, therefore, the U.S. Constitution is not being violated.

76. No letters are in existence for natural disasters, to my knowledge. No emergency plans for natural disasters exist at all levels of local government which meet the standards set by the NRC for the Callaway Plant emergency response planning, to my knowledge. The Callaway Plant emergency response plans are unique, therefore unique standards must be met if public health and safety is to be assured.

77. See the map attached herewith. All black areas (shaded) are the answer to this interrogatory.

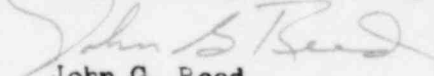
80. Methods of communication are defined as radio sets, frequencies to be used, timeliness of reports (reporting schedules, etc.), number of monitors being fielded to perform monitor surveys, etc. These are not a part of the local plan, nor are they specified in the State or utility plan.

90. A means of determining what constitutes an impediment, a means of locating it in a timely manner, advising response personnel and evacuees of where the impediment is located and either removing it or rerouting traffic so that it does not stop the protective effort or slow it. I have not resolved this problem because it requires available resources (equipment and personnel) and I am not part of the planning staff.

END ANSWERS

The above answers are respectfully submitted in compliance with the aforementioned Board Order. The undersigned has objected to responding to these questions because many of these answers are available from the person doing the actual planning. The Applicant is the local planner and as such is privy to all information regarding the content of the plans and SOPs. If local governments were doing their own planning, the situation would be different, but this is not the case.

Respectfully submitted,



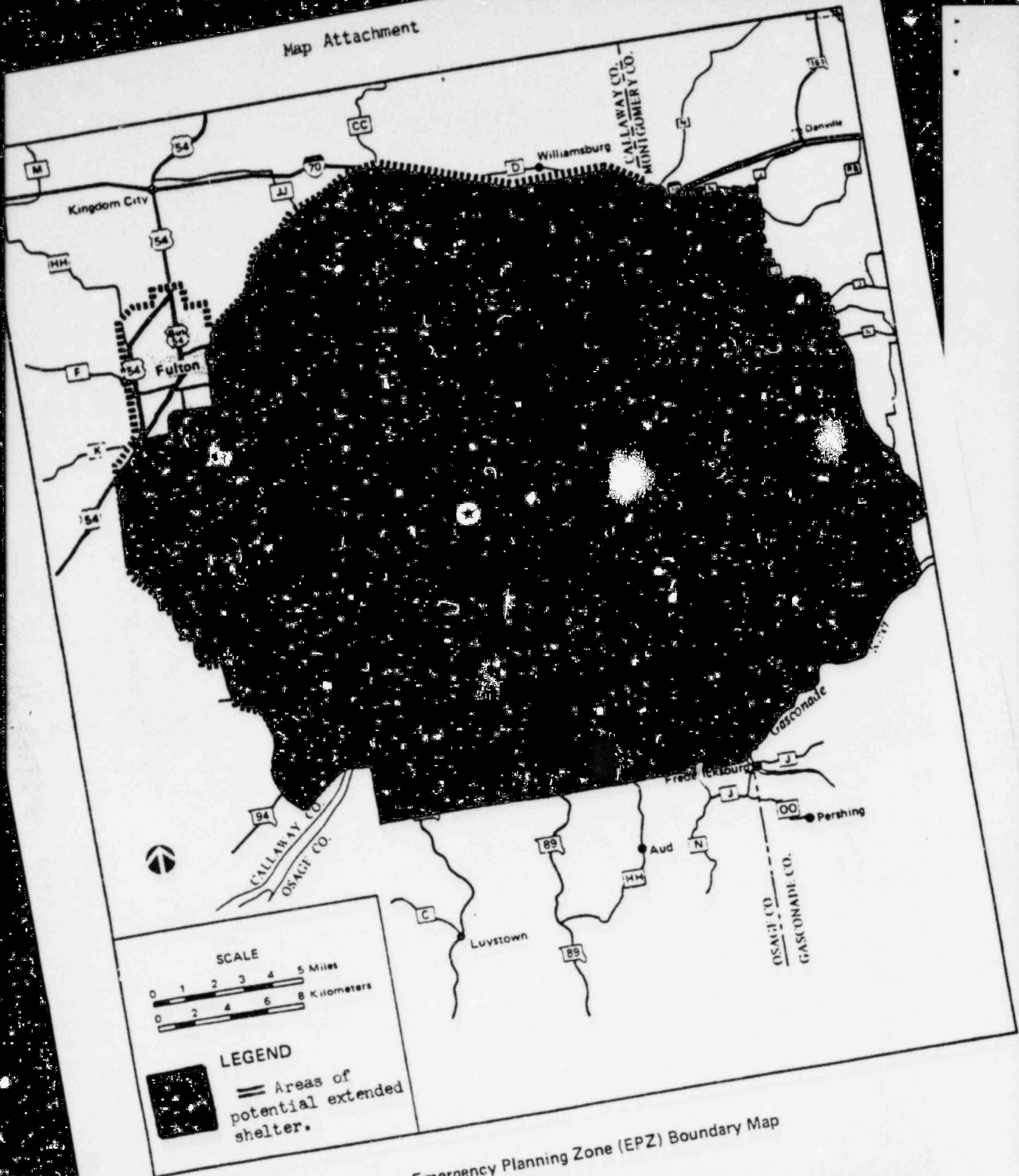
John G. Reed  
Citizen of the United States  
of America

Dated this 13th day  
of December 1982 at  
Kingdom City, MO.

RFD #1  
Kingdom City, MO. 65262  
tel: (314) 642-2769

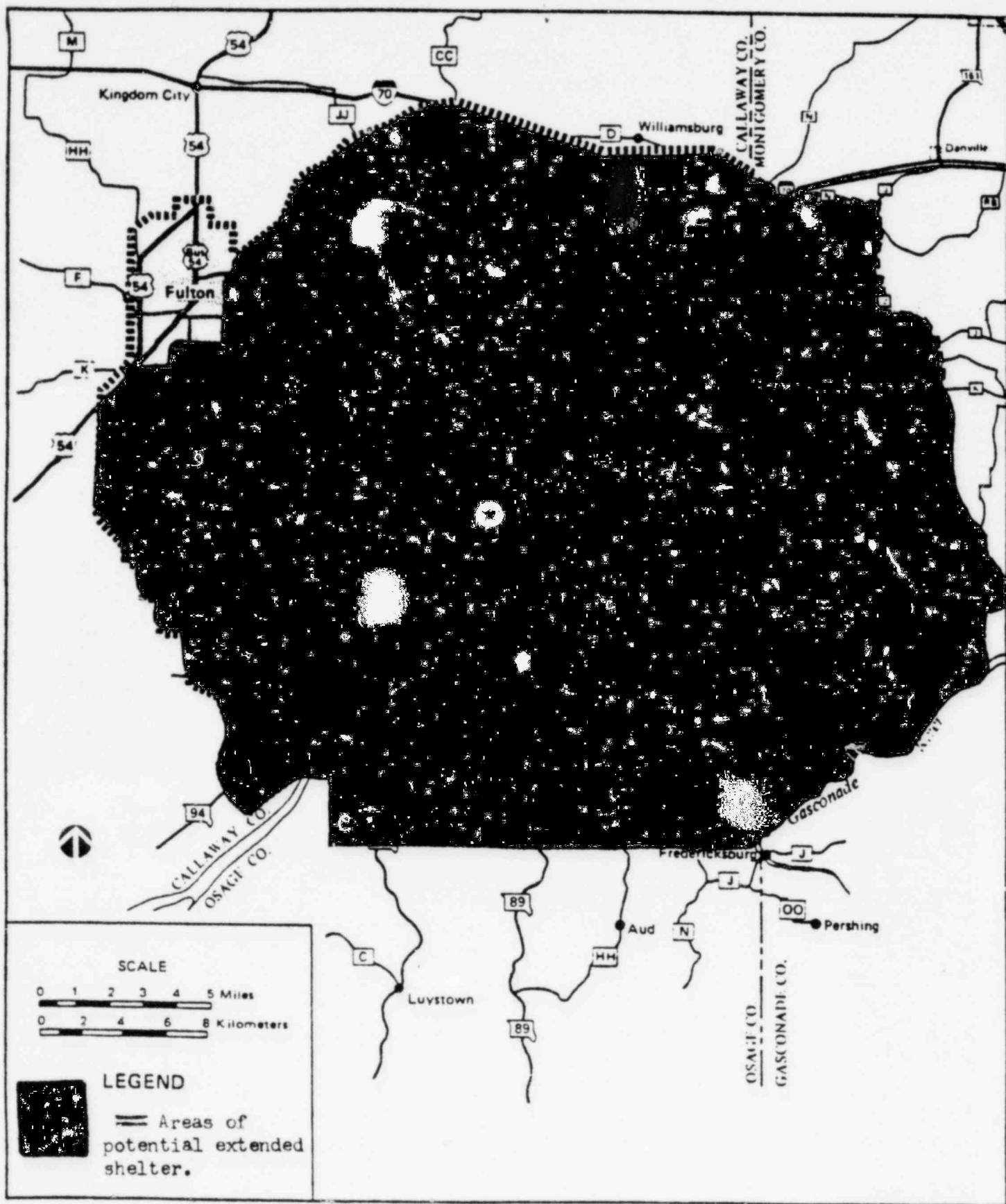
Attached: Map

Map Attachment



Emergency Planning Zone (EPZ) Boundary Map

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Emergency Planning Zone (EPZ) Boundary Map



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CERTIFICATE OF SERVICE

I hereby certify that the document attached hereto was served this  
14th day of December, 1982 by deposit in the U.S. mail, first  
class postage prepaid upon the following:

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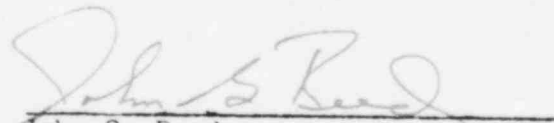
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\* hand delivered

  
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John G. Reed  
Citizen of the United States  
of America