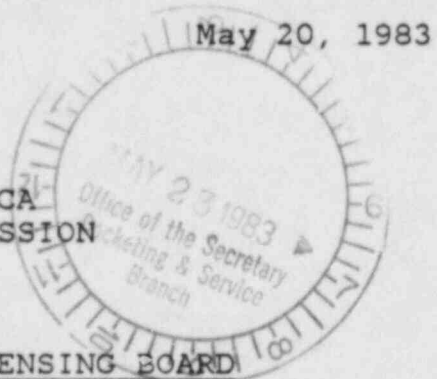


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



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 STATEMENT OF MATERIAL FACTS
ON REED CONTENTIONS 6 AND 16 AS TO WHICH THERE IS
NO GENUINE ISSUE TO BE HEARD
(PROTECTIVE ACTIONS AGAINST RADIOIODINES &
MESSAGES WITH INSTRUCTIONS FOR LONG-TERM SHELTERING)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contentions 6 and 16 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. The administration of potassium-iodine ("KI") to emergency workers and institutionalized persons whose immediate evacuation from the planning zone ("EPZ") may be infeasible or

very difficult in the event of a radiological emergency is recommended by the various federal agencies charged with evaluating and making recommendations to State agencies about the administration of KI.

2. To date, no federal agency has recommended the administration of KI to the general public located within the ten mile plume exposure pathway EPZ.

3. The State of Missouri policy on the administration of KI is fully consistent with current federal guidance and is soundly based on the factors that must be balanced in making this public health policy decision.

4. Neither sheltering nor ad hoc respiratory protection is intended to be a protective action that is equivalent in its appropriateness or its effect as the ingestion of KI.

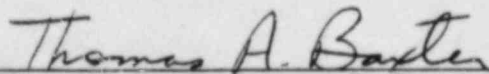
5. The use of sheltering as a viable protective action is supported by data on the ability of structures to shield individuals from exposure to radiation.

6. The use of ad hoc respiratory protection as a viable protective action is supported by data on the effectiveness of

using common household materials as inhalation filtering devices to minimize internal exposure to radioactive material.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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