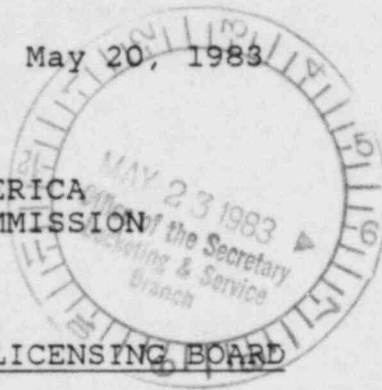


May 20, 1983

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 OL

APPLICANT'S STATEMENT OF MATERIAL FACTS
AS TO WHICH THERE IS NO GENUINE
ISSUE TO BE HEARD (CONTENTION 11)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 11, that there is no genuine issue to be heard with respect to the following material facts:

1. The off-site plans provide that the designated local decision-makers on recovery and reentry will utilize recommendations and information from the (Missouri) Bureau of Radiological Health and the Callaway Plant.

2. Standards need not be written to a level of detail which would permit local decision-makers to implement reentry and recovery operations independently of Applicant, State and Federal agencies.

3. Only general plans for recovery and reentry are required.

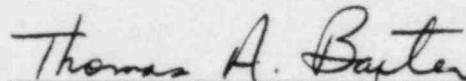
4. Radiation levels alone constitute an incomplete and inadequate basis for recovery and reentry decisions.

5. Utilization of a number of criteria, some of which are judgmental, calls for a degree of flexibility in the decision process.

6. The decision criteria specified in the off-site plans, for recovery and reentry, include radiation standards in the form of State Protective Action Guides, which are a part of the State plan, and which are recognized, endorsed and utilized in the local plans.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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