



May 20, 1983

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 CONTENTION 18 AS TO
WHICH THERE IS NO GENUINE ISSUE TO BE HEARD
(HUMAN FOOD AND ANIMAL FEEDS)

Pursuant to 10 C.F.R. § 2.749(a), Applicant states, in support of its motion for summary disposition of intervenor Reed's Contention 18 in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. The State of Missouri Nuclear Accident Plan - Callaway, as well as the Callaway County/Fulton Radiological Emergency Response Plan, Gasconade County Radiological Emergency Response Plan, Montgomery County Radiological Emergency Response Plan and Osage County Radiological Emergency Response Plan each allocate the responsibilities, specify the tasks and designate the resources to provide protective measures for human food and animal feeds.

2. These plans provide for sampling, radiological exposure evaluation, protective measures, survey information and communications in accordance with the guidelines established by the Food and Drug Administration for "Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies", 47 Fed. Reg. 47073 (1982), and those contained in the Nuclear Regulatory Commission/Federal Emergency Management Agency "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG-0654, FEMA-REP-1, Rev. 1 (1980), as well as the requirement of 10 C.F.R. § 50.47(b)(10).

3. These measures are adequate to prevent or minimize ingestion of contaminated foods and feeds as directed by the regulatory mandate and published guidelines.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

Thomas A. Baxter

Thomas A. Baxter, P.C.
Jeffrey A. Gibbs

Counsel for Applicant

1800 M Street, N.W.
Washington, D.C. 20036

(202) 822-1000

May 20, 1983