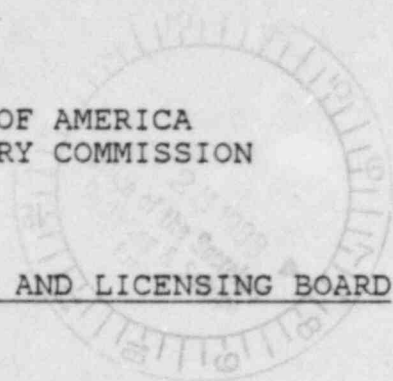


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
UNION ELECTRIC COMPANY) Docket No. STN 50-483 OL
)
(Callaway Plant, Unit 1))

AFFIDAVIT OF GLENNON EPPLE
ON REED CONTENTION 19
(IMPEDIMENTS TO THE USE OF EVACUATION ROUTES)

County of Gasconade)
) ss.
State of Missouri)

GLENNON EPPLE, being duly sworn, deposes and says as follows:

1. I am Associate Judge of the Administrative Court serving the Northern District of Gasconade County in the State of Missouri. My business address is the Gasconade County Courthouse, Hermann, Missouri. My District encompasses all of the Callaway Plant emergency planning zone ("EPZ") within Gasconade County. As a member of the Gasconade County Court, I am responsible for county road and bridge maintenance throughout the County, along with my colleagues on the Court.

The County road supervisor reports directly to the Court. I am a life-long resident of Gasconade County. I have personal knowledge of the matters stated herein and to the best of my knowledge believe them to be true and correct. I make this affidavit in response to Reed Contention 19 (Impediments to the Use of Evacuation Routes).

2. Reed Contention 19 asserts that the four county radiological emergency response plan and procedures fail to provide methods of identification of means of dealing with potential impediments to use of evacuation routes, and contingency measures for resolving such problems. The four county plan has been revised. Separate plans now exist for each of the four counties in the EPZ. In my view, the revised Gasconade County Emergency Response Plan adequately addresses these issues, given the potential for evacuation impediments in the County.

3. Within the Gasconade portion of the EPZ are roads which are the responsibility of the State of Missouri, the Morrison Special Road District, and the City of Morrison. The total area is approximately 2 square miles, with a population of about 200 persons. All of these roads have been taken into consideration in the following assessment of evacuation impediments.

4. Based on a review of these roads, I have concluded that there are no residences located within the EPZ which could potentially be isolated during the course of extensive

rainfall, with subsequent localized flooding preventing normal evacuation. This conclusion takes into account where the roads could potentially be blocked in excess of four hours.

5. A second natural impediment which has been considered is that of an unusually heavy snowfall occurring coincidental with an emergency at the nuclear plant requiring evacuation. In addressing this situation consideration must be given to the fact that the 10 mile radius from the Plant passes through the town of Morrison. For clarity in defining the EPZ boundary, the entire city was included. One road leads from the town. It needs to be cleared to assure proper evacuation. It is my opinion that using State resources, this can be accomplished in less than three hours. The citizens then would only have to travel a matter of up to a few blocks to reach the EPZ boundary, then continue on the State-maintained highway. Hence, I do not consider a heavy snowfall to be a serious impediment to evacuation.

6. Finally, man-made impediments to traffic flow will be noted by, or reported to, traffic control personnel who in turn will report such conditions to the Gasconade County EOC. Additional monitoring for impediments will be provided by State Civil Air Patrol. Removal of such impediments will be accomplished by State or County Highway personnel or through normal equipment resources available to the Sheriff.

7. In conclusion, it is my view that the significant evacuation impediments have been identified, and the resources

and planning effort necessary to overcome such impediments are available.

Glennon Epple
Glennon Epple

Subscribed and sworn to before me
this 16th day of May, 1983.

Lisa Lietzow
Notary Public

My Commission expires January 3, 1987.

LESA LIETZOW, Notary Public
Gasconade County
State of Missouri
My commission expires January 3, 1987