

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

'83 FEB 22 P2:51

REGISTRATION & SERVICE
BRANCH

REED'S REBUTTAL TO STAFF VIEWS
RELATING TO PART 20 STANDARDS, DATED 14
FEBRUARY 1983

Staff Counsel, in its views, identified above, acknowledged that 10 CFR, Part 20 establishes standards for protection against radiation (see Staff Views, II. DISCUSSION, first sentence). Section 20.1 (a) of said Part 20 specifically states:

"The regulations in this part establish standards for protection against radiation hazards arising out of activities under licenses issued by the Nuclear Regulatory Commission .."

If these regulations, indeed, establish standards for protection against radiological dangers, and there is no other standard within the framework the U.S. N.R.C. Rules and Regulations, Title 10 - Chapter 1, Code of Federal Regulations, then these standards must be applied, regardless of the date they were formulated, to protect the public health and safety from hazards arising out of activities under licenses issued by the NRC.

Staff states that the framers of the emergency planning regulations did not mean to apply Part 20 guidelines to recovery/reentry phase (see Staff Views, page two last two lines on the page), but Staff fails to provide an identification of other standards of protection against radiation hazards. Further, Staff comments (see Staff Views, page three, lines 3 & 4) are incorrect; Part 20 places a limit upon individual radiological exposures,

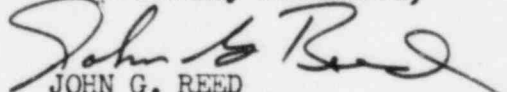
in restricted and unrestricted areas. The purpose of Part 20, is to set inflexible standards whereby public health and safety are reasonably assured within all areas identified within the regulation. To assume, as does Staff that safety standards that apply to routine operations of a nuclear power plant do not apply to extraordinary conditions (see Staff Views, page 2, lines 9, 10, & 11) are without foundation in regulation and can be viewed as a violation of Part 20, Section 20.6 Interpretations.

The standards set forth in Part 20 clearly identify acceptable dose or exposure levels for a complete cross-section of the population within and without the licensed facility. No other standards exist establishing protection of the public health and safety in the N.R.C. Rules and Regulations. No other Federal agency has authority to set such standards; therefore, it matters little whether or not Staff Counsel has applied these standards in its past activities; in this matter, no other alternative exists.

The establishment of an inflexible standard for radiological exposure of returning evacuees to an area is merely the basis by which general plans are formulated, and as such are the foundation or corner-stone for such a plan.

For the above reasons, the undersigned finds Staff views, identified above, to be without merit, and requests the Board to rule appropriately.

Respectfully submitted,


JOHN G. REED
Citizen of the United States
of America

Dated this 18th day
of February 1983 at
Kingdom City, MO.

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CERTIFICATE OF SERVICE

I hereby certify that the document attached hereto was served this
18 day of February, 1983 by deposit in the U.S. mail, first
class postage prepaid upon the following:

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