

August 14, 2009

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	Docket No. 52-037-COL
UNION ELECTRIC COMPANY d/b/a AmerenUE)	
)	
(Callaway Power Plant, Unit 2))	ASLBP No. 09-884-07-COL-BD01

**Joint Motion Of AmerenUE, NRC Staff, MCE/MSE, MAHUR, and MPC
Requesting Approval Of Settlement Agreement and Termination Of Contested Portion Of
Hearing**

Pursuant to 10 C.F.R. § 2.338(i), Union Electric Company d/b/a AmerenUE (“AmerenUE”), the Missouri Coalition for the Environment and Missourians for Safe Energy (“MCE/MSE”), Missourians Against Higher Utility Rates (“MAHUR”), the Missouri Office of the Public Counsel (“MPC”) and the NRC Staff (collectively “Joint Movants”) hereby jointly request that the Atomic Safety and Licensing Board (“Board”) approve a Settlement Agreement (“Settlement”) among the Joint Movants and, accordingly, terminate the contested portion of the hearing in this proceeding. The Missouri Public Service Commission (“MPSC”) – the only other petitioner in this proceeding – does not oppose this Joint Motion.

I. BACKGROUND

This proceeding involves an application (the “COLA”), submitted by AmerenUE on July 24, 2008, for a combined license to construct and operate a new nuclear plant at the site of AmerenUE’s Callaway Power Plant located in Callaway County, Missouri. In AmerenUE’s May 1, 2009 answers to intervention and hearing requests filed in this proceeding, AmerenUE explained to the Board that it was suspending its efforts to build a new nuclear power plant in

Missouri. AmerenUE also explained to the Board that it had requested the NRC Staff to continue its review of the COLA, while AmerenUE reviewed its options. AmerenUE pledged to keep the Board informed of the status of that internal review.¹

On June 26, 2009, AmerenUE filed a Motion requesting that the Board terminate the hearing in this proceeding (“Termination Motion”). The Termination Motion stated that AmerenUE had requested the NRC Staff to suspend all activities relating to the COLA. By letter dated June 29, 2009, the NRC Staff agreed to AmerenUE’s request, stating that it “has suspended all review activities relating to the Callaway Unit 2 COLA”² Counsel for NRC Staff forwarded that letter to the Board and the petitioners on June 30, 2009.

As set forth in the Termination Motion, MPSC and MPC did not oppose AmerenUE’s request to terminate the hearing. MAHUR did not file an answer to the Termination Motion (and later informed counsel for AmerenUE that MAHUR did not oppose termination of the hearing as requested by the Termination Motion). The NRC Staff filed an “Answer in Support of AmerenUE’s Motion to Terminate Hearing.”³ MCE/MSE filed a “Response of MCE/MSE to AmerenUE’s Motion Requesting Termination of Hearing,” which stated that they “support the motion to terminate the proceeding.”⁴ MCE/MSE’s Response also requested that the Board either “dismiss AmerenUE’s COLA” or alternatively impose certain conditions if termination of the hearing is granted but the COLA is not withdrawn.⁵ In a Memorandum and Order dated July 7, 2009, the Board scheduled a prehearing conference for July 28, 2009, during which the Board

¹ See, e.g., “AmerenUE’s Answer Opposing The Missouri Coalition For The Environment And Missourians For Safe Energy’s Petition To Intervene And Request For Hearing In Callaway Plant Unit 2 Combined Construction And Operating License Application” (May 1, 2009) at 3.

² Letter from David B. Matthews, Director, Division of New Reactor Licensing (NRC) to Adam C. Heflin, Senior Vice President and Chief Nuclear Officer, AmerenUE/Callaway Plant (June 29, 2009) at 1.

³ NRC Staff’s Answer In Support Of AmerenUE’s Request To Terminate Hearing (July 6, 2009) at 9.

⁴ Response Of MCE/MSE To AmerenUE’s Motion Requesting Termination Of Hearing (July 6, 2009) at 1.

⁵ *Id.* at 3-6.

intended to hold oral argument regarding AmerenUE's Termination Motion, the admission of contentions, and the standing of petitioners in this proceeding.⁶

On July 10, 2009, Joint Movants filed a Joint Motion requesting that the Board reconsider its July 7, 2009 Order.⁷ On July 16, 2009, the Board issued a Memorandum and Order "Postponing Initial Prehearing Conference and Setting Schedule for Submission of Settlement Agreement." In that Order, the Board provided the parties with an opportunity to file a settlement agreement with the Board on or before August 14, 2009 for the Board's consideration under 10 C.F.R. § 2.338.

II. REQUEST FOR APPROVAL OF SETTLEMENT AGREEMENT AND TERMINATION OF HEARING

In the Settlement Agreement attached hereto as Exhibit 1, the Joint Movants have resolved all issues among them regarding the conditions under which the contested portion of the hearing should be terminated. Approval of the Settlement Agreement and termination of the contested portion of the hearing is in the public interest because the NRC Staff has suspended its review of the COLA, and Joint Movants have agreed upon the conditions under which the hearing should be terminated. Accordingly, it would be an inefficient use of the Joint Movants' time and resources to proceed with adjudicating the matters raised by petitioners in this proceeding. Furthermore, Commission regulations encourage "[t]he fair and reasonable settlement and resolution of issues proposed for litigation" in licensing proceedings. 10 C.F.R. § 2.338.

⁶ Memorandum and Order (Permitting Reply to Responses to Motion to Terminate Hearing; Prehearing Conference Argument Time Allocations; Electronic Copy of Application) (July 7, 2009).

⁷ Joint Motion by AmerenUE, NRC Staff, MCE/MSE, MAHUR, and MPC Requesting Leave to File a Motion for Reconsideration and Requesting Reconsideration (July 10, 2009).

For the reasons set forth above, Joint Movants respectfully request that the Board issue an order consenting to the Settlement Agreement in the form of the proposed Consent Order attached hereto as Exhibit 2, and terminate the contested portion of the hearing in this proceeding.

Respectfully submitted,

/signed electronically by Jay E. Silberg/
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Attorneys for Petitioner Missourians
Against Higher Utility Rates

SETTLEMENT AGREEMENT

This Settlement Agreement, dated August 14, 2009, is entered into by and between Union Electric Company d/b/a AmerenUE (“AmerenUE”), the Missouri Coalition for the Environment and Missourians for Safe Energy (“MCE/MSE”), Missourians Against Higher Utility Rates (“MAHUR”), the Missouri Office of the Public Counsel (“MPC”), and the Staff of the United States Nuclear Regulatory Commission (“NRC Staff”) (individually a “Party” and collectively the “Parties”).

WHEREAS, on July 24, 2008, AmerenUE submitted to the United States Nuclear Regulatory Commission (“NRC” or “Commission”) an application seeking a combined license to construct and operate a new nuclear plant in Callaway County, Missouri (“COLA”);

WHEREAS, on December 12, 2008, the NRC docketed the COLA as sufficient for review by the NRC Staff;

WHEREAS, on February 4, 2009, the NRC published a “Notice of Hearing and Opportunity to Petition for Leave to Intervene” in a proceeding (Docket No. 52-037) to consider the COLA;

WHEREAS, on April 6, 2009, MCE/MSE, MAHUR, MPC, and the Missouri Public Service Commission filed petitions requesting leave to intervene in Docket No. 52-037, which included requests for hearing submitted by MCE/MSE and MAHUR;

WHEREAS, on June 23, 2009, AmerenUE requested that the NRC Staff suspend its review of the COLA;

WHEREAS, on June 26, 2009, AmerenUE filed a motion requesting that the Atomic Safety and Licensing Board established to preside over the proceeding (“Board”) terminate the hearing in Docket No. 52-037;

WHEREAS, on June 29, 2009, the NRC Staff stated that it would suspend its review of the COLA;

WHEREAS, on July 6, 2009, MCE/MSE filed a response to AmerenUE’s request for termination asking, among other things, that the Board impose certain conditions in the event the Board terminates the hearing;

WHEREAS, on July 16, 2009, the Board issued a Memorandum and Order “Postponing Initial Prehearing Conference and Setting Schedule for Submission of Settlement Agreement,” which provided the Parties with the opportunity to file a settlement agreement with the Board reflecting the conditions under which the hearing regarding the COLA and the pending hearing requests would be resolved:

NOW, THEREFORE, the Parties hereby agree to the following:

1. Request for Termination of Hearing. As soon as possible after the date of this Settlement Agreement, but in no event later than August 14, 2009, the Parties shall jointly submit this Settlement Agreement to the Board and shall request that the Board issue an order consenting to this Settlement Agreement in the form of Attachment 1 hereto ("Consent Order") and terminating the contested portion of the hearing established in Docket No. 52-037.
2. New Notice of Hearing. It is the understanding of the Parties that, in the event the Board terminates the contested portion of the hearing as requested pursuant to Section 1 of this Settlement Agreement, and AmerenUE, or any other entity, subsequently requests that the NRC Staff resume its review of the COLA, whether in its current form or amended, revised, modified or changed in any manner, and NRC Staff determines that the COLA is complete for docketing, the NRC Staff will use its best efforts to have the Commission issue a new Notice of Opportunity to Petition For Leave to Intervene, and AmerenUE shall, or shall cause such other entity to, provide a copy of such Notice to each person listed on the service list in Docket No. 52-037 as such list exists on the date of this Settlement Agreement.
3. Intervention in New Proceeding. No Party shall object to a request for hearing or petition for leave to intervene submitted by any other Party (or other person) in the proceeding initiated by the Notice described in Section 2 of this Settlement Agreement based on a claim that such other Party's or person's request or petition fails to satisfy the Commission's rules for timely filing, except if such request or petition is not filed within the time period for timely intervention set forth by the Notice.
4. Proposed Contentions in New Proceeding. No Party shall object to any proposed contention raised by any other Party (or other person) in the proceeding initiated by the Notice described in Section 2 of this Settlement Agreement based on a claim that such proposed contention fails to satisfy the Commission's rules for timely proposing contentions, except if such proposed contention is not filed within the time period for timely submittal of contentions set forth by the Notice.
5. No Withdrawal. In the event the Board terminates the contested portion of the hearing in Docket No. 52-037 as requested by the Parties pursuant to Section 1 of this Settlement Agreement, no Party (other than AmerenUE) shall seek withdrawal of the COLA from the NRC's docket or request that the NRC remove the COLA from the NRC's docket, except in the event that the Commission issues the Notice described in Section 2 of this Settlement Agreement.
6. No Litigation Fees. In the event the Board terminates the contested portion of the hearing in Docket No. 52-037 as requested by the Parties pursuant to Section 1 of this Settlement Agreement, no Party shall make any claim for recovery of its litigation expenses, including attorneys' fees, incurred in connection with Docket No. 52-037 prior to the date of this Settlement Agreement.
7. Joint Request. In the event the Board does not terminate the contested portion of the hearing in Docket No. 52-037 as requested by the Parties pursuant to Section 1 of this

Settlement Agreement, or terminates the contested portion of the hearing without consenting to the conditions agreed to by the Parties in Sections 2-6 of this Settlement Agreement, the Parties may file a joint request that the Commission terminate the contested portion of the hearing (if the Board has not done so) and approve any such conditions not consented to by the Board. If all Parties do not join in the request, no Party will oppose such request filed by the other Parties.

8. Standing. In any proceeding initiated by the Notice described in Section 2 of this Settlement Agreement, or in any new or renewed proceeding relating to the COLA, AmerenUE shall not challenge the standing of MAHUR, MCE/MSE or MPC. Nothing in this Section 8 or any other provision of this Settlement Agreement shall limit any Party's right to challenge the admissibility of any and all contentions proposed by MAHUR, MCE/MSE or MPC in any such proceeding.
9. Waiver Of Further Proceedings. The Parties waive further procedural steps before the Board, any right to challenge the validity of the Consent Order entered in accordance with this Settlement Agreement, and all rights to seek judicial review or otherwise contest the validity of the Consent Order.
10. Effect Of Consent Order. The Consent Order shall have the same force and effect as an order issued by the Board after a full hearing.
11. Resolution Of All Issues. The Settlement Agreement and the Consent Order resolve all issues among the Parties in Docket No. 52-037 identified in this Settlement Agreement that were required to be adjudicated.
12. Authority. Each Party hereby represents and warrants that it has the authority and is otherwise fully authorized to enter into this Settlement Agreement on its own behalf and on behalf of any other person or entity who may claim from, through, or under such Party.
13. Entire Agreement. This Settlement Agreement constitutes the entire agreement among the Parties respecting the subject matter hereof, supersedes all previous discussions, negotiations, representations, agreements concerning such matters, and shall not be changed or modified in any respect except by a signed writing executed by duly authorized representatives of the Parties.
14. Counterparts. This Settlement Agreement may be executed in any number of counterparts, each of which will be deemed to be an original, and which together constitute one and the same instrument.

IN WITNESS WHEREOF, the Parties have caused this Settlement Agreement to be executed by their duly authorized representatives.

Union Electric Company d/b/a AmerenUE

By: Jay E Silber
Title: Counsel for Union Electric Co d/b/k
Date: 8/14/09 AmerenUE

U.S. Nuclear Regulatory Commission Staff

By: _____
Title: _____
Date: _____

Missouri Coalition for the Environment

By: _____
Title: _____
Date: _____

Missourians Against Higher Utility Rates

By: _____
Title: _____
Date: _____

Missourians for Safe Energy

By: _____
Title: _____
Date: _____

Missouri Office of the Public Counsel

By: _____
Title: _____
Date: _____

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Union Electric Company d/b/a AmerenUE

By: _____

Title: _____

U.S. Nuclear Regulatory Commission

Staff

By: _____

Title: _____

Missouri Coalition for the Environment

By: *C. Kathleen Roy Smith*

Title: *Executive Director*

Missourians Against Higher Utility Rates

By: _____

Title: _____

Missourians for Safe Energy

By: _____

Title: _____

Missouri Office of the Public Counsel

By: _____

Title: _____

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Union Electric Company d/b/a AmerenUE

By: _____

Title: _____

U.S. Nuclear Regulatory Commission

Staff

By: _____

Title: _____

Missouri Coalition for the Environment

By: _____

Title: _____

Missourians Against Higher Utility Rates

By: _____

Title: _____

Missourians for Safe Energy

By: Mark Hair

Title: Chair

Missouri Office of the Public Counsel

By: _____

Title: _____

IN WITNESS WHEREOF, the Parties have caused this Settlement Agreement to be executed by their duly authorized representatives.

Union Electric Company d/b/a AmerenUE

By: _____
Title: _____
Date: _____

U.S. Nuclear Regulatory Commission Staff

By: Ann P. Hodgdon
Title: NRC Staff Counsel
Date: 8/13/09

Missouri Coalition for the Environment

By: _____
Title: _____
Date: _____

Missourians Against Higher Utility Rates

By: _____
Title: _____
Date: _____

Missourians for Safe Energy

By: _____
Title: _____
Date: _____

Missouri Office of the Public Counsel

By: _____
Title: _____
Date: _____

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Title: _____
Date: _____

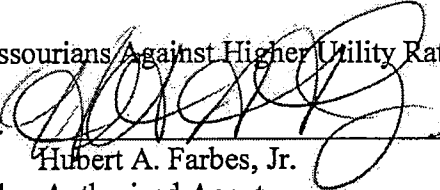
U.S. Nuclear Regulatory Commission Staff

By: _____
Title: _____
Date: _____

Missouri Coalition for the Environment

By: _____
Title: _____
Date: _____

Missourians Against Higher Utility Rates

By:  _____
Hubert A. Farbes, Jr.
Title: Authorized Agent
Date: August 13, 2009

Missourians for Safe Energy

By: _____
Title: _____
Date: _____

Missouri Office of the Public Counsel

By: _____
Title: _____
Date: _____

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Union Electric Company d/b/a AmerenUE

By: _____
Title: _____
Date: _____

U.S. Nuclear Regulatory Commission Staff

By: _____
Title: _____
Date: _____

Missouri Coalition for the Environment

By: _____
Title: _____
Date: _____

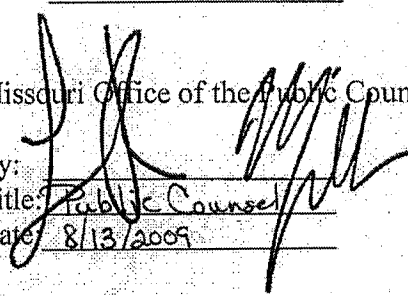
Missourians Against Higher Utility Rates

By: _____
Title: _____
Date: _____

Missourians for Safe Energy

By: _____
Title: _____
Date: _____

Missouri Office of the Public Counsel

By: 
Title: Public Counsel
Date: 8/13/2009

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	Docket No. 52-037-COL
UNION ELECTRIC COMPANY d/b/a AmerenUE)	
)	
(Callaway Power Plant, Unit 2))	ASLBP No. 09-884-07-COL-BD01

ORDER

(Approving Settlement Agreement and Terminating Contested Portion of the Hearing)

On August 14, 2009, Union Electric Company d/b/a AmerenUE (“AmerenUE”), the Missouri Coalition for the Environment and Missourians for Safe Energy (“MCE/MSE”), Missourians Against Higher Utility Rates (“MAHUR”), the Missouri Office of the Public Counsel (“MPC”) and the NRC Staff (collectively “Joint Movants”) submitted a Joint Motion requesting that the Atomic Safety and Licensing Board approve the Settlement Agreement attached to the Joint Motion and terminate the contested portion of the hearing in the above-captioned proceeding.

Pursuant to our authority under 10 C.F.R. § 2.338(i), we grant the Joint Motion, approve the Settlement Agreement, and terminate the contested portion of the hearing.

It is so ORDERED.

FOR THE ATOMIC SAFETY
AND LICENSING BOARD

G. Paul Bollwerk, III
Chairman

Rockville, Maryland

_____, 2009

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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(Callaway Power Plant, Unit 2))	ASLBP No. 09-884-07-COL-BD01

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Pursuant to our authority under 10 C.F.R. § 2.338(i), we grant the Joint Motion, approve the Settlement Agreement, and terminate the contested portion of the hearing.

It is so ORDERED.

FOR THE ATOMIC SAFETY
AND LICENSING BOARD

G. Paul Bollwerk, III
Chairman

Rockville, Maryland

_____, 2009

August 14, 2009

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of)
) Docket No. 52-037-COL
UNION ELECTRIC COMPANY d/b/a AmerenUE)
)
(Callaway Power Plant, Unit 2)) ASLBP No. 09-884-07-COL-BD01

CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of August, 2009, a copy of the foregoing "Joint Motion Of AmerenUE, NRC Staff, MCE/MSE, MAHUR, and MPC Requesting Approval Of Settlement Agreement and Termination Of Contested Portion Of Hearing" was provided to the Electronic Information Exchange for service upon the following persons:

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/signed electronically by Jay E. Silberg/

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