

August 19, 1981

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety and Licensing Board

In the Matter of

KANSAS GAS & ELECTRIC COMPANY et al.

(Wolf Creek Generating Station,
Unit No. 1)

)
)
) Docket No. STN 50-482
)
)
)

APPLICANTS' FIRST SET OF INTERROGATORIES
TO INTERVENOR SALAVA

The Licensing Board's July 15, 1981 "Order (Extension of Time)" provided that discovery requests were to be filed by August 19, 1981.

These interrogatories are filed pursuant to 10 C.F.R. § 2.740b which requires that the interrogatories be answered separately and fully in writing and under oath or affirmation. The interrogatories are intended to be continuing in nature and the answers should immediately be supplemented or amended, as appropriate, should Intervenor obtain any new or differing information responsive to the interrogatories. As specified by the Board's July 15, 1981 Order, responses must be filed by September 24, 1981.



DSB3
S
1/1

Emergency Planning Contention

- EP-1. Identify the evacuation plan(s) which you contend is(are) not workable.
- EP-2. Specify the criteria which you apply to determine whether an adequate level of staffing exists to successfully implement the evacuation plan(s).
- EP-3. Identify each of the "governmental bodies" which you contend are insufficiently staffed to successfully implement an evacuation.
- EP-4. With respect to each governmental body identified in your answer to Interrogatory EP-3 above, specify the function(s) which that body is relied on to perform in an evacuation but which you allege will not be adequately performed due to insufficient staffing.
- EP-5. With respect to each function listed in your answer to Interrogatory EP-4 above, indicate (a) the approximate number of personnel available to perform that function in an evacuation and (b) the number of additional personnel you contend are required to successfully implement that function in an evacuation.
- EP-6. Specify the criteria which you apply to determine whether the personnel of "governmental bodies" are adequately trained to perform their assigned functions pursuant to the evacuation plan(s).

- EP-7. Identify any personnel of "governmental bodies" which you contend lack sufficient training to perform their assigned functions in an evacuation.
- EP-8. With respect to each governmental body referred to in your answer to Interrogatory EP-7 above, specify the function(s) which that body is relied on to perform in an evacuation, but which you contend its personnel are not properly trained to perform.
- EP-9. With respect to each function listed in your answer to Interrogatory EP-8 above, describe in detail the training which the personnel must receive in order to successfully perform that function in an evacuation.
- EP-10. Specify the criteria which you apply to determine whether governmental bodies are sufficiently equipped to successfully implement the evacuation plan(s).
- EP-11. Identify each of the "governmental bodies" which you contend are insufficiently equipped to successfully implement an evacuation.
- EP-12. With respect to each governmental body listed in your answer to Interrogatory EP-11 above, describe each piece of equipment which that body does not now have but which you contend is required to successfully implement an evacuation, and explain why each such piece of equipment is required to successfully implement an evacuation.
- EP-13. Specify the criteria which you apply to determine whether governmental bodies are sufficiently funded to successfully implement the evacuation plan(s).

- EP-14. Identify each of the "governmental bodies" which you contend are insufficiently funded to successfully implement evacuation plans.
- EP-15. With respect to each governmental body identified in your answer to Interrogatory EP-14, specify the amount of additional funds you contend is necessary for successful implementation of evacuation plans.
- EP-16. With respect to each amount identified in your answer to Interrogatory EP-15, describe in detail what you contend the proposed additional amount should be used to fund.
- EP-17. Describe any deficiencies (other than staffing, training, equipment and funding deficiencies identified in answers to the above interrogatories) which you contend render the evacuation plan(s) unworkable.
- EP-18. With respect to each of your answers to Interrogatories EP-1 through EP-17 above, answer General Interrogatories 1 through 4.

Financial Qualifications Contention

- FQ-1. Specify the criteria which you apply to determine whether Applicants are financially qualified to operate the Wolf Creek facility.
- FQ-2. Describe each aspect in which you contend financial conditions have changed since the issuance of the

construction permit for the Wolf Creek facility, and explain the impact of those changes on the costs of operating the Wolf Creek facility.

FQ-3. Describe each aspect in which you contend Applicants lack the financial ability to operate the Wolf Creek facility.

FQ-4. Specifically identify the figures, and the source(s) of the figures, which you contend are Applicants' estimates of the costs of operating the Wolf Creek facility.

FQ-5. State specifically the manner in which you contend the costs identified by the Applicants for operating the Wolf Creek facility have increased and are underestimated.

FQ-6. State specifically the amount by which you contend the costs of operating the Wolf Creek facility have increased over Applicants' projected costs, or are underestimated, and identify the the individual components which make up those increased or underestimated costs.

FQ-7. Identify specifically any "work stoppages" which you contend have increased the cost of operating the Wolf Creek facility, and explain in detail how, and the amount by which, each has increased operating costs.

FQ-8. Identify specifically any "construction problems" which you contend have increased the cost of

operating the Wolf Creek facility, and explain in detail how, and the amount by which, each has increased operating costs.

- FQ-9. Identify specifically any "regulatory changes made necessary by Three Mile Island problems" which you contend have increased the cost of operating the Wolf Creek facility, and explain in detail how, and the amount by which, each has increased operating costs.
- FQ-10. Identify specifically any "costs of permanent waste storage" which you contend have increased the costs of operating the Wolf Creek facility, and explain in detail how, and the amount by which, each has increased operating costs.
- FQ-11. Identify specifically any "potential delays due to water draught conditions" which you contend have increased the costs of operating the Wolf Creek facility, and explain in detail how, and the amount by which, each has increased operating costs.
- FQ-12. Identify specifically any "air and water emissions" which you contend have increased the costs of operating the Wolf Creek facility, and explain in detail how, and the amount by which, each has increased operating costs.
- FQ-13. Describe in detail the relationship, if any, which you believe exists between the safe operation of the Wolf Creek facility and the increased operating costs

alleged in your answers to Interrogatories FQ-2 through FQ-12 above.

FQ-14. Specify all information on which you rely regarding the costs of operating a nuclear power plant.

FQ-15. Specify the criteria which you apply to determine whether Applicants are financially qualified to decommission the Wolf Creek facility.

FQ-16. Describe each aspect in which you contend financial conditions have changed since the issuance of the construction permit for the Wolf Creek facility, and explain the impact of those changes on the costs of decommissioning the Wolf Creek facility.

FQ-17. Describe each aspect in which you contend Applicants lack the financial ability to decommission the Wolf Creek facility.

FQ-18. Specifically identify the figures, and the source(s) of the figures, which you contend are Applicants' estimates of the costs of decommissioning the Wolf Creek facility.

FQ-19. State specifically the amount by which you contend Applicants have underestimated the cost of decommissioning the Wolf Creek facility.

FQ-20. Describe what you contend will be the cost of decommissioning the Wolf Creek facility. State whether the cost is in constant (i.e., real) or current (i.e., inflated) dollars. Identify the

method of decommissioning on which your figures are based.

- FQ-21. Describe in detail the "reserve" which you contend Applicants should establish for the Wolf Creek facility. The description should include, but not be limited to, an explanation of how the proposed "reserve" would be funded.
- FQ-22. Specify all information on which you rely regarding the costs of decommissioning a nuclear power plant.
- FQ-23. With respect to each of your answers to interrogatories FQ-1 through FQ-22 above, answer General Interrogatories 1 through 4.

Emergency Planning and Financial Qualifications Contentions

- EP/FQ. With respect to each individual whom you intend to call as a witness in this proceeding:
- a. Identify by name and address each such individual;
 - b. State the educational and professional background of each such individual, including occupation and institutional affiliations, publications and papers;
 - c. Identify the contention as to which each such individual will testify;
 - d. Describe, to the extent known, the nature of the testimony which may be presented by each such individual;

- e. Identify by court, agency or other body, proceeding, date, and subject matter all prior testimony by each such individual.

GENERAL INTERROGATORIES

1. Is your answer based upon one or more documents?¹ If so:
 - a. Identify each such document on which your answer is based.
 - b. Identify the information in each document on which your answer is based.
 - c. Explain how such information provides a basis for your answer.
2. Is your answer based upon any type of study, calculation, or analysis? If so:
 - a. Describe the nature of the study, calculation, or analysis and identify any documents which discuss or describe the study, calculation, or analysis.
 - b. Who performed the study, calculation, or analysis?
 - c. When and where was the study, calculation, or analysis performed?

1 For the purpose of these General Interrogatories, "documents" means all writings and records of every type in the possession, control or custody of Intervenor, including but not limited to memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, speeches, articles, transcripts and all other records, written, electrical, mechanical or otherwise.

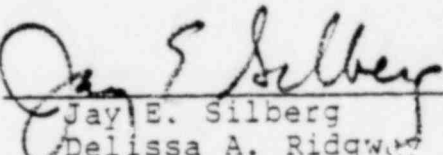
"Documents" shall also mean copies of documents even though the originals thereof are not in the possession, custody or control of Intervenor.

- d. Describe in detail the information that was studied, calculated, or analyzed.
 - e. What were the results of such study, calculation, or analysis?
 - f. Explain how such study, calculation, or analysis provides a basis for your answer.
3. Is your answer based upon research? If so:
- a. Describe all such research and identify each document discussing or describing such research.
 - b. When and where was the research conducted?
 - c. By whom was the research conducted?
 - d. Explain how such research provides a basis for your answer.
4. Is your answer based upon conversations, consultations, correspondence or any other type of communications with one or more individuals? If so:
- a. Identify by name and address each such individual.
 - b. State the educational and professional background of each such individual, including occupation and institutional affiliations.
 - c. Describe the nature of each communication with each such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from each such individual and explain how it provides a basis for your answer.

- e. Identify each letter, memorandum, tape, note or other record related to each conversation, correspondence, or other communication with such individual.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By 
Jay E. Silberg
Delissa A. Ridgway
Counsel for Applicants

1800 M Street, N. W.
Washington, D. C. 20036
(202) 822-1000

Dated: August 19, 1981