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June 21, 1983

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Kansas Gas and Electric Company
(Wolf Creek Generating Station, Unit 1)
Docket No. STN 50-482

Gentlemen:

By letter to the Board, dated June 13, 1983, Applicants provided to the Board and the other parties a compilation of Intervenor's interrogatory responses. By agreement of the parties, the compilation is to serve as the statement of issues for litigation in this proceeding.

Intervenor's counsel reviewed the June 13 compilation, and conferred with Applicants' counsel on June 20 to request modifications to the June 13 compilation.

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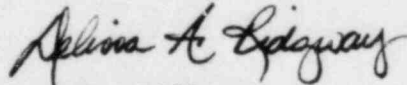
June 21, 1983
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As a result of the June 20 discussions, Applicants and Intervenor have agreed on modifications to Contentions 3a, 15c, 19s, 29c, 29h(23) and 29h(24). Enclosed are "change pages" numbered 3, 14, 23, 32 and 34 which reflect these changes, and should be inserted into the June 13 compilation in place of the corresponding numbered pages. In addition, "change pages" numbered 2, 22 and 24 are enclosed for insertion into the June 13 compilation, to correct typographical errors in Contentions 1l, 19k and 19aa.

Counsel for Applicants has reviewed the precise language of each change reflected in this package with counsel for Intervenor, who concurs that it is an accurate statement of the parties' agreement. Counsel for Intervenor discussed other modifications and expansions of the contentions, as to which Intervenor and Applicants were unable to reach agreement. These proposals may be the subject of a separate filing by counsel for Intervenor.

The parties' positions on contentions on medical treatment for radiologically exposed and contaminated, injured individuals remain as stated in Applicants' May 19, 1983 letter to the Board. The matter is ripe for disposition by the Board.

Very truly yours,



Jay E. Silberg
Delissa A. Ridgway

Counsel for Applicants

Enclosures

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
KANSAS GAS AND ELECTRIC COMPANY, et al.) Docket No. STN 50-482
)
(Wolf Creek Generating Station,)
Unit No. 1))

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other means of communications is provided for. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]

- h. The County Plan does not specify what happens if the Chairman of the County Commission attempts to make the notifications listed in Table 3-1 and the people to be contacted are not available. (C, § 1.2.1) [4/7/83 Answers, at 13]
- i. The County Plan does not specify who the Fire Leader is to notify if a fire chief is not available. (C, § 1.2.6) [4/7/83 Answers, at 19]
- j. It is not specified what the fire chiefs of the various cities are to do when they are notified by the Fire Leader. (C, § 1.2.6) [4/7/83 Answers, at 19]
- k. The County Plan does not provide who will be responsible for the 24 hour per day manning of the communications links that the Sheriff is responsible for. (C, § 1.2.2) [4/7/83 Answers, at 14]
- l. The County Plan does not consider what happens if communications equipment is not available to the Sheriff to provide communications between Coffey County and Wolf Creek and between Coffey County and the State. There is not adequate backup equipment. (C, § 1.2.2) [4/7/83 Answers, at 14]

2. Coffey County Courthouse and EOC Communications

- a. Due to insufficient staffing, Coffey County cannot provide adequate dispatchers to handle communications. Although 9 personnel are needed to fill this function, only 5 dispatchers are presently available. [1/22/82 Answers, at 3,4]
- b. Ten or twelve additional people will be required to handle telephone calls at the Coffey County Emergency Operations Center. None of these people are available. [4/7/83 Answers, at 2,5]
- c. The telephone system will not be adequate. There will not be enough lines in the event of an emergency. (C, § 4.2.1) [4/7/83 Answers, at 41]

- d. There are not enough telephones at the County Emergency Operations Center to handle the calls that will come in during an emergency. [4/7/83 Answers, at 7]
- e. An adequate number of telephone numbers or lines are not provided to handle the calls made by people who will call in seeking transportation to be evacuated. (C, §§ 1.2.5, 3.5) [4/7/83 Answers, at 19,32]

3. Sheriff's Communications Equipment

- a. The Sheriff needs radio equipment that will permit him to talk to the Wolf Creek Plant and all of Coffey County. (C, §§ 1.2.2, 4.2.2) [4/7/83 Answers, at 7,15,41]

4. County EOC Power

- a. There is not an adequate source of emergency power at the Coffey County Emergency Operations Center. The emergency generator located in the County EOC has not operated properly. There is no assurance that it will operate properly in the event of an emergency. (C, § 4.1) [4/7/83 Answers, at 9,41]

5. Coffey County Courthouse and EOC Security

- a. Due to insufficient staffing, Coffey County cannot provide security for the Coffey County Courthouse in the event of an emergency. Although 6 persons are needed to fill this function, none are presently available. [1/22/82 Answers, at 3,4]
- b. The Sheriff has not assigned any person to be responsible to control access to the County Courthouse and County EOC during an emergency. (C, § 1.2.2) [4/7/83 Answers, at 14]

- b. The details of how the Health and Medical Management Team will provide transportation and alternate facilities for patients at hospitals and nursing homes are not specified. (C, § 3.3.2) [4/7/83 Answers, at 30]
- c. Coffey County does not have sufficient transportation (ambulances, buses, etc.) to evacuate people from nursing homes and the Coffey County Hospital. (C, §§ 1.2.7, 3.3.2) [4/7/83 Answers, at 8,20,30]
- d. If the communications frequency is changed, the Coffey County Ambulance Service needs radio equipment to communicate with the Sheriff's Office and others. This will require equipment for 2 vehicles. [1/22/82 Answers, at 9]
- e. The County Engineer will not be able to provide transportation to evacuate people from nursing homes and the Coffey County Hospital because of other duties that he has in the time of an emergency. (C, § 1.2.7) [4/7/83 Answers, at 20]
- f. Coffey County will need litters to evacuate nursing home patients. Ten litters will be needed for the Sunset Manor Nursing Home, and twenty litters would be needed for the Golden Age Lodge Nursing Home in Burlington. Two litter buses will be required to provide for the evacuation of nursing homes. [1/22/82 Answers, at 10]
- g. Due to insufficient staffing, Coffey County cannot assist with evacuation of nursing homes. Although 15 personnel would be required to fill this function, none are presently available. [1/22/82 Answers, at 3,4]
- h. Due to insufficient staffing, Coffey County cannot provide ambulances for emergency patients and at the same time provide for evacuation of hospital patients. Although 6 personnel would be required to fill this function, none are presently available. [1/22/82 Answers, at 2,4]
- i. Due to insufficient staffing, Coffey County Hospital cannot provide for the special treatment of emergency patients and at the same time assist with evacuation of its regular patients. Although 6 personnel would be required to fill this function, none are presently available. [1/22/82 Answers, at 2,4]

- f. The County Plan does not contemplate what to do if members of the Radiation Monitoring Team are not available. (C, § 3.10) [4/7/83 Answers, at 38]
- g. The County Plan indicates that the Radiation Monitoring Team personnel can be on the scene within 45 minutes after notification. This is too long a period. (C, § 3.10) [4/7/83 Answers, at 38]
- h. The County Radiation Monitoring Team has not been selected. (C, §§ 1.1, 1.2.10) [1/22/82 Answers, at 6; 4/7/83 Answers, at 12,22]
- i. The County Plan is deficient because it does not state how many members of the Radiological Monitoring Team will be required, and does not contemplate enough people to handle the duties of the Radiological Monitoring Team. (C, §§ 1.1, 1.2.10) [4/7/83 Answers, at 12,23]
- j. Due to insufficient staffing, Coffey County cannot provide radiological monitoring. Although 45 persons are needed to fill this function, only 1 Radiological Monitor is presently available. [1/22/82 Answers, at 2,4]
- k. Coffey County will not be able to perform decontamination and radiation checks within the County and at evacuation centers, because it is not adequately staffed. There is no provision in the County Plan for an adequate number of personnel to supplement the County Radiation Monitoring Team in order to check evacuees and vehicles at shelters for contamination. The Coffey County Plan shows 104 people will be needed at the evacuation centers for contamination checks (page 3-8). None of these are available. At least 150 will be needed for this. The plan does not specify how they will be recruited. Also, there are no people available at the evacuation centers to handle decontamination. It is possible that as many as 100 people will be required for decontamination. (C, § 3.7) [4/7/83 Answers, at 2,4-5,34]
- l. The Fire Leader does not have enough personnel to conduct the decontamination activities. (C, §3.7) [4/7/83 Answers, at 34]
- m. Fire Department personnel may be needed elsewhere at the same time they are needed for decontamination purposes. (C, § 1.2.6) [4/7/83 Answers, at 19]

- n. The County Plan does not provide the details about how the fire personnel will handle decontamination. (C, § 1.2.6) [4/7/83 Answers, at 20]
- o. Due to insufficient staffing, Coffey County cannot provide for decontamination at roadblocks. Although 16 personnel are needed to fill this function, only 8 Burlington Fire Department personnel are presently available. [1/22/82 Answers, at 2,4]
- p. The County Plan does not provide for the number of radiation monitoring personnel that will be required to check vehicles and people for contamination at access points. (C, § 3.7) [4/7/83 Answers, at 34]
- q. The State radiation monitoring equipment is not sufficient to deal with the type of emergency that can occur at Wolf Creek. (K, Tab A) [4/7/83 Answers, at 9,44]
- r. The Coffey County Radiation Monitoring Team does not have proper radiation monitoring equipment to monitor radiation in the event of an evacuation. (C, §§ 1.2.10, 3.0) [1/22/82 Answers, at 10; 4/7/83 Answers, at 22,38]
- s. Coffey County does not have enough radiation monitoring equipment to monitor in the County, to check evacuees for contamination, and to monitor roadblocks and access points. [4/7/83 Answers, at 8,9]
- t. The County Plan is deficient because it does not indicate how the 30 Radiation Monitoring Kits that Coffey County has will be distributed. If the kits are matched with the number of people required to implement the plan and their duties, there will be an insufficient number of kits and equipment. (C, § 4.3.1) [4/7/83 Answers, at 41]
- u. There is no provision in the County Plan for how the monitoring kits and the equipment in them will be distributed. (C, § 4.3.1) [4/7/83 Answers, at 41]
- v. The fire departments of the City of Burlington and other cities in Coffey County do not have sufficient radiation monitoring equipment that will detect radiation. [1/22/82 Answers, at 8-9]
- w. The Coffey County Sheriff's Department needs radiation monitoring equipment. [1/22/82 Answers, at 9]

- x. There is no adequate provision for insuring that the County radiation monitoring equipment is properly tested and maintained so that it will be in working condition at the time of the emergency. (C, § 4.3.1) [4/7/83 Answers, at 41]
- y. The Radiation Monitoring Teams do not have enough vehicles for transportation to various sites in the County. The County Plan contemplates that Radiation Monitoring Team members will use their personal vehicles or County vehicles for transportation. There will not be enough County vehicles available and there are no plans to insure that the personal vehicles of the monitoring team will be available. (C, § 3.10) [4/7/83 Answers, at 9,37]
- z. The Coffey County Radiation Monitoring Team should be equipped with portable communications equipment for contacting others involved in an emergency or an evacuation process. Communications equipment for 18 people is required. [1/22/82, at 10]
- aa. The Coffey County Radiation Monitoring Team does not have the communications equipment it needs to keep in touch with the County Emergency Operations Center and others. The Coffey County Plan is deficient where it provides that the Radiation Monitoring Team will communicate with the County EOC by telephone. In all likelihood, there will not be enough telephone lines available so that prompt communication can be accomplished. (C, § 3.10) [4/7/83 Answers, at 9,37]
- bb. The County Plan does not make adequate provision for how communications will be handled between the Radiological Defense Officer and the members of the Radiological Monitoring Team. There is not sufficient equipment available to provide this communication. (C, § 1.2.10) [4/7/83 Answers, at 23]
- cc. There is no agreement between the County and the fire departments about the use of fire department vehicles for decontamination responsibilities. (C, § 1.2.6) [4/7/83 Answers, at 19]
- dd. There are not enough vehicles and decontamination equipment available to meet the decontamination responsibilities at roadblocks, access points, and evacuation centers. (C, § 3.7) [4/7/83 Answers, at 8,34]
- ee. The fire departments of Burlington and other cities in Coffey County do not have five tank trucks for use

- b. Due to insufficient staffing, Coffey County cannot provide training for personnel in evacuation procedures and other procedures required for personnel to implement an evacuation plan. Although 2 persons are needed to adequately perform the training function, only 1 (the Emergency Planning Coordinator) is presently available. [1/22/82 Answers, at 1,4]
- c. The Coffey County Emergency Preparedness Coordinator has not developed the training programs needed to implement the County Plan, and has not made adequate plans to familiarize Coffey County personnel with the plan and their responsibilities. (C, §§ 1.2.3, 5.1) [4/7/83 Answers, at 42,16; 5/12/83 Response, at 4]
- d. The County Plan does not contemplate training as many individuals as will actually be needed if the plan is to be implemented. (C, §1.2.3) [4/7/83 Answers, at 16]
- e. There is no provision in the County Plan to indicate who will actually do the teaching. (C, §1.2.3) [4/7/83 Answers, at 17]
- f. The key personnel within the Coffey County government who occupy positions in the emergency response organization are not aware enough of their duties under the plan. There must be some assurance in the County training program that the Emergency Preparedness Coordinator knows that the individuals understand their responsibilities and that they are adequately trained. (C, §§ 1.1, 5.1) [4/7/83 Answers, at 12,42]
- g. The County Plan should specify in detail the type and amount of training that individuals will receive. The training to be provided to the positions listed in Table 5-1 should be specified in detail. (C, §5.1, Table 5.1) [4/7/83 Answers, at 42,43]
- h. The following local personnel lack sufficient training to perform their assigned functions and should be trained in the identified areas:
 - (1) The Coffey County Emergency Preparedness Coordinator. Advice to Sheriff about protective action to take; locating, storing, and distribution of emergency equipment; training personnel about evacuation duties and emergency equipment; have knowledge about radiation monitoring, decontamination processes, and use of protective gear; understanding duties of each person

- (11) Traffic control personnel. (C, §1.2.2) [4/7/83 Answers, at 14]
- (12) Coffey County Health Officer. [4/7/83 Answers, at 6]
- (13) Volunteer teams to provide medical care and first aid (to be trained by the County Health Officer). (C, §1.2.7) [4/7/83 Answers, at 20]
- (14) Coffey County Health Nurse. [4/7/83 Answers, at 6]
- (15) Nursing home administrators and staff. [4/7/83 Answers, at 6]
- (16) Coffey County Hospital Staff. Evacuation of patients at hospital. [1/22/82 Answers, at 4,6; 4/7/83 Answers, at 6]
- (17) Coffey County Ambulance Service. Evacuation of patients at hospital and coordination of that duty with treatment of individuals injured in an emergency. [1/22/82 Answers, at 4,6]
- (18) Radiological Defense Officer. (C, § 1.2.10) [4/7/83 Answers, at 6,21]
- (19) Coffey County Radiological Monitoring Team. Taking an evaluation of radiation levels; operation of radiological monitoring equipment; knowledge about allowable radiation dosages; use of protective gear. (C, §§ 1.2.10, 3.0) [1/22/82 Answers, at 4,6; 4/7/83 Answers, at 22,38]
- (20) Personnel assisting the Radiation Monitoring Team with radiation monitoring checks. (C, §3.7) [4/7/83 Answers, at 34]
- (21) Shelter Leader. (C, §1.1) [4/7/83 Answers, at 6,12]
- (22) Temporary Shelter Managers. (C, §3.8) [4/7/83 Answers, at 6,35]
- (23) Shelter Managers and shelter staff. (C, §1.2.8) [4/7/83 Answers, at 6,21]
- (24) Bus drivers. About their duties and to assure that they will respond. [4/7/83 Answers, at 30]