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June 22, 1983

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

Gentlemen:

1. This is the response of the Intervenor to the Applicants' Collation of Intervenor's Interrogatory Responses (Hereafter referred to as "Collation") which was submitted to the Board by the Applicants in a letter dated June 13, 1983.

2. The Intervenor and the Applicants have conferred about the Collation and have agreed to amend it in certain ways as will be specified in a separate letter from the Applicants to the Board. The Applicants and the Intervenor have not been able to agree upon certain amendments that the Intervenor has offered to the Collation. These amendments are specified in paragraphs 3 and 4 below. Additionally, the Intervenor believes that in the Collation the Applicants have interpreted too narrowly the agreement between the parties that relates to the effect of an evacuation of the entire County (as contemplated by the plan) upon the evacuation of the 10 Mile EPZ. That agreement is set forth in the Applicants' letter to the Board dated May 19, 1983, page 2, paragraph 3. The Intervenor's position on this issue is below.

3. The following should be added to the Collation as item 29.w, p. 37: "If a duty is assigned to a person, that person is not adequately trained to handle that duty and would not be able to adequately handle that duty in an emer-

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gency." The language to be added was not included in the Collation. It was part of an answer to Interrogatory EP-8 which was included in the Amended and Supplemental Answers to Applicants' Interrogatories to Intervenor, dated April 6, 1983, p. 6, (Hereafter referred to as "Intervenors' April 6, answers"). While this is a broad contention, the Intervenor believes that it can be supported. There is no indication at this stage of the proceedings that any person is adequately trained to handle duties assigned to that person under the State or Coffey County plans. The statement is not vague or qualified. Rather, it is specific in that it includes all duties. In drafting the interrogatory answer referred to, the Intervenor chose to respond as indicated rather than to submit a lengthy "laundry list".

4. The following contention was an answer to Interrogatory EP-16, item 11, p. 11, Intervenor's April 6 answers, and was omitted from the Collation. It should be added to the Collation as item 32.c, p. 41 as follows: "The estimates of costs are very difficult to determine. For example, we have assumed that certain vehicles might be rented. Perhaps, they might actually be purchased. Also, it is very difficult to determine the number of days that evacuees would need to be sheltered, and it is difficult to estimate the number of serious injuries that can occur. Changes in these estimates can substantially effect the total number of dollars that will be required from Coffey County." This addition should be made in order to permit the Intervenor to raise questions about costs based on variables not used to prepare the specific interrogatory answers. It would not be fair to require the Intervenor to specify in advance of the hearing every possible cost based on the infinite number of variables that can possibly exist.

5. (a.) The Applicants' have agreed that the scope of issues to be litigated includes the effect on evacuation of the Plume Exposure Pathway EPZ of an order to evacuate the entire County. See the Applicants' letter referred to in paragraph 2 above. In the Collation, the Applicants have acknowledged this by footnotes at certain items in the Collation. See for example page 20 of the Collation. In addition to the footnoted items, there are additional contentions made by the Intervenor that are based on the provisions in the Coffey County plan to evacuate the entire county. Even though these are not footnoted by the Applicants, the Intervenor should be permitted to litigate the effect of an evacuation of the entire county on these contentions which have not been footnoted in the Collation.

(b.) The County plan contemplates plans for the evacuation of the entire County. See Intervenor's Response to Applicants' Objections to Certain Proposed Issues and Motion for Adoption of Interrogatory Responses as Statement

of Issues for Litigation (May 12, 1983), Exhibit B. If the County is going to evacuate the entire County, then it must provide the personnel and resources to do so. If it does so, then this effects the evacuation of the 10 Mile EPZ because personnel and resources that would be available for use in evacuation of that zone might be used in the evacuation of the entire county. This makes it unlikely that a successful evacuation of the EPZ could be carried out. In effect, once the county commits itself to an evacuation of the entire County, it must have enough people and resources to evacuate both the 10 mile EPZ and the remainder of the County. Additionally, if the entire County is evacuated, this may increase the amount of time that it will take to evacuate the 10 mile EPZ because of greater congestion on the evacuation routes.

(c.) The following are examples of Intervenor's contentions that are effected by an evacuation of the entire county. The Intervenor's contend that the sirens for making the initial warning will not be adequate to warn the entire County. See Intervenor's April 6 answers, at p. 27. If there is to be an evacuation of the entire County and people in all of the County are not warned, there will be confusion and this will effect the evacuation of the 10 mile EPZ. In item 24.d of the Collation the Intervenor's contend that there are 62 people needed to confirm evacuation. This contemplates confirmation for the entire County. If Coffey County plans for such an evacuation, then that number of people must be available. If they are not, then the officials cannot decide when the time for evacuation comes to divert people from duties in the 10 mile EPZ to duties in the other parts of the County.

(d.) The following items in the collation are additional examples of contentions where the effect of an evacuation of the entire county would have a possible adverse effect upon the evacuation of the 10 mile EPZ: 1.1, 2.c, 3.a, 7.a, 9.c, 9.e, 10.a-10.d, 11.a-11.1, 12.e-12.g, 13.a, 13.b, 14.b, 15.n, 16.a-16.d, 16.f-16.h, 16.k-16.n, 18.c, 18.e, 18.h, 18.k, 18.g, 18.r, 18.y, 18.z, 18.aa, 19.k, 19.hh, 19.11, 20.d, 20.k, 20.1, 21.b, 22.b, 23.a, 23.b, 24.b, 24.c, 31.f, 31.j, 32.a, 32.b.

6. The Intervenor's are willing to accept the Collation as their contentions in this proceeding if the contentions specified in paragraphs 3 and 4 above are added to the Collation and if the scope of litigation for the Intervenor's contentions includes the effect on evacuation of the Plume Exposure Pathway EPZ of an order to evacuate the entire County as specified by the Intervenor's in paragraph 5 above. For purposes of this paragraph, the Collation includes the amendments thereto which the Applicants and the Intervenor's have agreed upon as specified

in the letter sent to the Board by the Applicants and referred to in paragraph 2 above.

Very truly yours,

John M. Simpson

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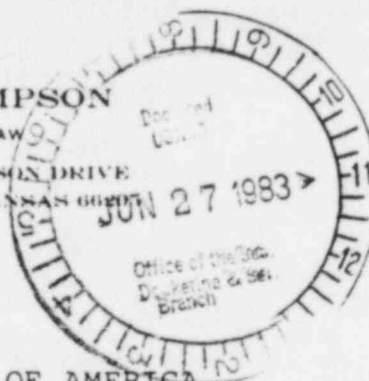
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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)

KANSAS GAS AND ELECTRIC COMPANY, et al.)

(Wolf Creek Generating Station,
Unit No. 1)

) Docket No. STN 50-482
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