

UNITED STATES OF AMERICA '83
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

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

PROPOSED STIPULATION OF CONTENTIONS

As directed by the Board's Prehearing Conference Order, the intervenors, Mary Ellen Salava and Wanda Christy, offer the following as a detailed explanation of their contention about the inadequacy of the Coffey County and State of Kansas Emergency Preparedness Plans.

The intervenors' contention which was admitted is as follows: "Local governments do not have a workable evacuation plan and the Wolf Creek facility should not be licensed until there is a workable plan and until the government bodies in the evacuation area are sufficiently staffed, equipped, and funded to successfully carry out evacuation plans."

Paragraphs 1 - 21 below specify in detail the objections of the intervenors, and should be adopted as the Stipulation of Contentions.

1. (a.) The State and County Plans are deficient because all personnel who have been assigned responsibilities in the plans are not adequately trained and are not sufficiently familiar with the plans and their responsibilities.

(b) In many instances, personnel who are to perform a function have not been selected.

(c.) Assigned functions have not been carried out in many instances by the individual responsible for the function.

2. The details of the plans are not adequate. In most instances, the plans are deficient because they do not provide sufficient detail about how, when, and with what equipment emergency personnel charged with a responsibility will handle it.

3. The plans make no provisions for paying the costs of carrying out the plans. Such costs will be incurred for equipment, shelter facilities, emergency workers' salaries, use of equipment, housing of evacuees, medical costs, and training.

4. (a.) The plans are deficient because they do not adequately specify the number of people and the type and amount of equipment and facilities that will be required to meet a duty specified under the plan.

(b.) Frequently, the plans underestimate the number of people that will be required to perform a function.

(c.) In many instances, not enough people are available to perform an assigned function.

(d.) The plans do not specify how people who have duties under the plans will be recruited.

(e.) Frequently, the plans require people to perform two functions at the same time.

5. The plans are deficient because they do not adequately detail how to evacuate transients and do not provide how they will be sheltered if that response rather than evacuation is chosen.

6. The plans are deficient because they do not give officials making a decision about evacuation or another emergency response sufficient guidelines about choosing one response in preference to another. The plans should provide detailed guidelines about what emergency response is to be chosen in specified circumstances and at certain stages of an accident.

7. The plans are insufficient because they do not provide adequate backup personnel for officials or workers who are not available to perform their duties. Also, they do not specify what will be done if people or equipment are not available.

8. The plans are deficient because they rely on the assumption that emergency workers and the general public will always act as directed and in a very rational manner. The plan should make adequate provision to deal with people (workers and the general public) who fail to respond or respond in ways other than assumed. The plans cannot assume that people will respond in a nuclear emergency as they will in any other disaster situation.

9. The plans are deficient because they do not give adequate consideration to the problems weather conditions, severe weather, and changes in weather

will create. The plans do not provide enough flexibility to deal with weather problems that will occur.

10. The plans do not take into consideration the full range of accident scenarios that can occur. For example, sheltering might be selected as a response and then later evacuation would be appropriate. The plans do not prepare emergency personnel to consider enough of the possibilities and problems that can occur and then provide them alternatives to meet these various possibilities. The plans do not adequately consider the number of people who will have to be dealt with at various times.

11. The plans are deficient because they do not contemplate that a very substantial number of radiological injuries can occur. Hundreds or even more such injuries could occur. The plans do not provide for quick and adequate evacuation and treatment for that number of injuries. Also, hospital facilities for that number of people have not been arranged for, and the hospitals are not prepared to deal with that number of injuries.

12. (a.) The State and the County Plans make reference to the other plan and indicate that certain functions will be coordinated or that the State or the County will supplement the other. The details of such cooperation and supplementation are not adequately specified. Therefore, confusion and lack of action will result during an emergency response at the time of an accident.

(b.) In some instances, one part of the State or the County plan conflicts with another part about what will be done and who is responsible for a specified duty.

13. Much of the equipment and facilities required to implement the plans are not available or are inadequate. Also, little, if any, plans have been made to obtain such equipment or facilities.

14. The amount of time required to complete an evacuation will be longer than is indicated in the plans. Because the estimated evacuation time is not correct, officials may choose an emergency response that will cause more injuries. Also, because the time estimate is too short, the number of injuries that can occur will be under estimated.

15. The plans are deficient because adequate methods to educate the public about how to respond to an emergency have not been developed. The details of such education should be specifically set forth in the plan. The draft emergency notices to be broadcast during an emergency are not adequate.

16. In the event of an accident, the initial notice of the accident to the public cannot be made in the time required by NUREG 0654, and some people will not receive the warning notice as required.

17. The emergency plans are deficient because details about the extent of drills and exercises and their planning and conduct are not included in the plans. Coffey County and the State of Kansas have made little and inadequate preparation for such drills and exercises.

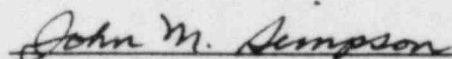
18. The plans do not provide adequate assurance that they will be reviewed and revised in a timely manner. Also, there is no indication of how the public

will be kept advised of changes in the plans so they can attempt to respond properly when an accident occurs. The plans do not adequately provide for the checking of equipment and maintenance on sirens, radiation monitoring equipment, and other equipment required to implement the plans.

19. The plans do not provide enough detail about training programs, and few, if any, plans for these programs have been developed. The plans do not provide any adequate means to test if the emergency personnel and the general public adequately understand their duties and roles at the time of an accident.

20. The plans are deficient because there is inadequate provision for coordination of specified duties between units of government and within a governmental unit.

21. The plans are deficient because in some instances, one plan contradicts the provisions in another plan about who is responsible for a function or the plans lack sufficient details to make it clear which unit of government and its personnel will be responsible for a particular function.


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Dated: April 6, 1983