

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'83 APR 11 A9:57

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))

AMENDED AND SUPPLEMENTAL ANSWERS TO
APPLICANTS' INTERROGATORIES TO INTERVENORS.

The intervenors, Wanda Christy and Mary Ellen Salava, being first duly sworn, state under oath as follows:

The following are supplemental and amended answers to certain of the Applicants' First Set of Interrogatories to the Intervenors:

EP-1 The plans of Coffey County and the State of Kansas are not workable. Additionally, the plans of the U.S. Corp of Engineers, the U.S. Fish and Wildlife Service, and the Kansas Fish and Game Department for handling an emergency that effects transients at John Redmond Reservoir are not workable.

EP-3 Coffey County, the State of Kansas, U.S. Fish and Wildlife Service, the U.S. Corps of Engineers, and the Kansas Fish and Game Department.

EP-4 In addition to the functions specified in our original answer to Interrogatory EP-4, Coffey County will not be able to perform the following functions because it is not adequately staffed: (1) the management of evacuation centers. (2)

verification of an evacuation. (3) decontamination and radiation checks within the County and at evacuation centers. (4) emergency medical care to people with radiation injuries and other types of injuries. (5) rescue services in the evacuated area. (6) identify in advance the people who will need emergency transportation. (7) Adequate telephone communications.

The State of Kansas will not be able to perform the following functions because it is inadequately staffed:

1. The Department of Health and Environment does not have enough people to perform the functions specified in Section 2.1.1.2, page B-16 of the State Plan.

2. The Kansas Department of Transportation does not have enough staff to perform all the functions specified in Section 2.1.2.2, page B-17, of the State Plan.

3. The Kansas Highway Patrol does not have sufficient staff to perform all of the functions specified in Section 2.1.2.1, page B-17, of the State Plan.

4. The Department of Social and Rehabilitation Services does not have sufficient staff to perform its functions in regard to the coordination and operation of evacuation centers, as specified in Section 2.1.2.11, page B-17 of the State Plan.

5. The U.S. Corps of Engineers, the U.S. Fish and Wildlife Service, and the Kansas Fish and Game Department cannot educate the transients around John Redmond Reservoir about the evacuation and emergency plans, cannot provide adequate warning when there is an accident, and cannot evacuate up to 10,000 transients at the reservoir because each of those agencies does not have sufficient staff.

EP-5 1. The revised plan of Coffey County does not make reference to the use of National Guard personnel. Therefore, to the extent that our previous answer considered such personnel, it is revised to delete such consideration. Consequently, in some instances, even fewer people are available to perform an assigned function.

2. Ten - fifteen more people will be required for evacuation traffic control than were specified in our previous answers.

3. We estimated 50 people would be required to provide transportation for people not having their own transportation. That estimate is too low. We estimate that at a minimum, 100 people will be required. We believe that it is reasonable to assume that at least 10% of the people to be evacuated will be without transportation. None of the people required to perform this function are available.

4. The area to be secured after the evacuation may be all of Coffey County. Therefore, at least the number of people listed for security will be required.

5. Apparently, the revised plans no longer provide for a County Emergency Operations Center at New Strawn. Therefore, the people listed as needed for it are not required.

6. In order to clear the roads of snow, a total of 50 - 75 people would be required to do the job in a reasonable amount of time. There are only 22 people on the County Road and Bridge Crew who can perform this task.

7. There are no people available to provide management at the evacuation centers. Up to 9,000 people would be evacuated. One person for each 50 people evacuated will be needed. Therefore, 180 people are required.

8. There are no people available to provide evacuation confirmation. The plan (Table 3-6) shows 62 are required. Confirmation should be done quicker than specified in Table 3-6. Therefore, twice as many people are probably required.

9. There are not enough trained people outside of Coffey County to provide medical care to injured persons. There could be several hundred or even more radiation and other injuries. It is, however, difficult to accurately estimate the number of people required to treat that number of injuries. It could be several hundred or more.

10. 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. 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.

11. There are no people available for rescue duties. A team of 20 people or more should be available for such services.

12. There is only one person available to identify people who will need emergency transportation because they do not have such transportation. Two or three people will be required for this. Additionally, there are no people available to coordinate the evacuation of individuals without transportation. Ten or more people would be required for this function.

13. 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.

14. The State and the Federal agencies that have the responsibility for the emergency planning and evacuation at John Redmond Reservoir would need 40 or 50 people to make the additional warning, confirm the evacuation, provide transportation for those without it, and direct traffic. We do not know how many of these people are available.

15. At this time we are not able to estimate the number of employees of the Kansas Department of Transportation, Department of Health and Environment, Highway Patrol, and Department of Social and Rehabilitation

Services that will be required to carry out their duties under the plan. Also, we do not know the number, at this time, that would be available to perform those functions.

EP-6 Emergency personnel should also be trained and instructed about the risks involved with radiation and other possible injuries that can occur during an emergency. They need to be instructed about the importance of making themselves available even if there are substantial dangers during the performance of a function.

EP-7 These are additional personnel who lack training to perform their assigned function in an evacuation: Coffey County Commissioners, Coffey County Health Officer, Coffey County Health Nurse, Nursing Home Administrators and Staff, shelter leaders and shelter staff, Radiological Defense Officer, Coffey County Clerk, personnel of the Kansas Department of Health and Environment, personnel of the Kansas Highway Patrol, personnel of the Kansas Department of Transportation, personnel of the Kansas Department of Social and Rehabilitation Services, U.S. Corps of Engineers, U.S. Fish and Wildlife Service personnel, Kansas Fish and Game personnel, medical personnel at hospitals, Coffey County Sheriff Department personnel, volunteers and other personnel yet to be recruited who will have responsibilities under the plan.

EP-8 After an analysis of the State and Coffey County plans, we believe it is not an exaggeration to say that 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 emergency.

EP-10 The following are additional criteria to be used in determining if governmental bodies are sufficiently equipped to implement the evacuation plan: availability of the required equipment; maintenance of equipment; the speed with which a function is to be performed; availability of replacement equipment; the number of people that will use the equipment; the funding for additional equipment; will a specified amount of equipment do the job; and does the plan provide for the right kind of equipment for the job specified.

EP-11 In addition to the governmental body specified in our previous answer, the State of Kansas, including its departments with responsibilities, the U.S. Corps of Engineers at John Redmond Reservoir, and the U.S. Fish and Wildlife Service at John Redmond Reservoir are inadequately equipped to implement their functions in the evacuation and emergency plan.

EP-12 1. There are not enough shelter facilities for 9,000 evacuees at the shelter centers. This will require sleeping, food preparation, medical, sanitation, and other facilities if the shelter needs are to be met.

2. The Sheriff needs radio equipment that will permit him to talk to security at the Wolf Creek Plant.

3. There are not enough telephones at the County Emergency Operations Center to handle the calls that will come in during an emergency.

4. Coffey County does not have enough snow plows, desalting trucks, and other snow removal equipment to clear the roads for an evacuation.

5. Coffey County does not have enough communications equipment for each of the roadblocks. There are about 65 roadblocks.

6. Coffey County does not have enough emergency vehicles to evacuate persons who do not have transportation.

7. There are not enough vehicles and decontamination equipment available to meet the contamination responsibilities at roadblocks, access points, and evacuation centers.

8. The hospitals who will treat persons with radiation injuries do not have enough equipment to do this. Also, there is not enough equipment to provide on the scene treatment and emergency transportation for persons with serious injuries.

9. There is not enough equipment (ambulances, buses, etc.) to evacuate people from nursing homes and the Coffey County Hospital.

10. There are not enough school buses available to evacuate school children.

11. Coffey County does not have enough equipment to check evacuees for radiation exposure.

12. There are not enough dosimeters for emergency personnel.

13. 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.

14. The Radiation Monitoring Teams do not have enough vehicles for transportation to various sites in the County.

15. There is no equipment available to transport pregnant women and small children who would be evacuated earlier than others might be evacuated.

16. There is not an adequate source of emergency power at the Coffey County Emergency Operations Center.

17. The Coffey County Radiation Monitoring Team does not have enough radiation monitoring equipment to monitor in the County, to check evacuees for contamination, and to monitor roadblocks and access points.

18. The State of Kansas radiation monitoring equipment is not adequate to meet its responsibilities under the emergency plan.

19. The Kansas Department of Health and Environment is not equipped to provide emergency medical services.

20. The Kansas Department of Social and Rehabilitation Services is not equipped to provide supplemental services and assistance at evacuation centers.

EP-13 The availability of funds from other units of government and Kansas Gas and Electric Company will effect the amount required from Coffey County.

EP-15 The revised amount of additional funds that Coffey County needs for a successful implementation of the evacuation plan is \$4,153,000.00.

EP-16 In addition to the costs previously detailed for the costs of the emergency plan, these are the additional costs:

1. Decontamination equipment at evacuation centers, \$200,000.00.
This is 200 sets of equipment.

2. Radiation monitoring equipment at decontamination centers, \$100,000.00. This is 100 sets of equipment.

3. Shelter for 9,000 people at evacuation centers for five days at \$50.00 per day per person. Total \$2,250,000.00.

4. Additional telephones and telephone communication equipment for Coffey County, \$15,000.00.

5. Additional snow removal equipment for Coffey County (10 trucks and blades), \$200,000.00.

6. Rental of emergency transportation vehicles. Two hundred vehicles at \$50.00 each. Total, \$10,000.00.

7. Additional communications equipment for 60 roadblocks.

Total, \$60,000.00.

8. Emergency medical care and evacuation for 1,000 radiological injuries, \$500,000.00.

9. Additional compensation for 300 workers, \$75,000.00. Originally, we estimated the compensation at \$50.00 per day, but we believe that \$100.00 is more reasonable. The amount of time allocated is still five days of compensation.

10. Rental of vehicles for the Radiation Monitoring Team. Ten vehicles at \$50.00 per day for five days, \$2,500.00.

11. 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.

EP-17 The following are deficiencies which render the State and County plans unworkable. Unless otherwise specified, reference to a Section, Table, Page or Figure will be to the Coffey County plan. Some of the deficiencies will be duplicative of previous answers for Interrogatories EP-1 to EP-16.

SECTION 1.1

1. 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.
2. The shelter managers at the evacuation centers have not been designated and selected.
3. No person is designated as the leader of the Health and Medical Management Team.
4. The personnel, materials, etc. required for the emergency response should be detailed more, and the person responsible for the control of the personnel and materials should be designated in more detail.
5. There has been no provision to provide the volunteer support for the Health and Medical Management Team. The plan does not contemplate enough volunteers to deal with several hundred or more radiological injuries.
6. The shelter leader has not been selected or trained.
7. The plan is deficient because it does not provide enough shelter at evacuation centers for the 9,000 people in Coffey County who would be evacuated.
8. No radiation monitoring team has been selected. The plan does not contemplate enough people to handle the duties required of the radiation monitoring team.

SECTION 1.2.1

1. The plan does not specifically specify what type of public proclamations will be issued by the County Commissioners and under what circumstances the public proclamations will be issued.
2. The plan does not establish guidelines and details about how and when a curfew will be imposed by the County Commissioners.
3. The plan does not specify what type of coordination will occur between the Kansas Division of Emergency Preparedness and the County Commissioners in regard to the issuance of public proclamations and the establishment of curfews.
4. The Coffey County Commissioners do not know what priorities to set in regard to resources not identified in the plan, and they do not know what these resources are. The criteria for setting the priorities and an inventory of the resources should be included in the plan.
5. The 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.
6. The Chairman of the County Commission is not capable of assuring that the portions of the emergency response organization which require 24 hour per day coverage are staffed or that the required resources are requested from

the State. The plan needs to set forth how he will accomplish this in relation to other people involved in the plan.

SECTION 1.2.2

1. The 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.
2. The 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.
3. The plan does not indicate what types of special activities will be handled at "priority" road blocks, and it does not indicate how many people will be required to handle these duties. The sheriff does not have enough people for these duties.
4. The plan does not provide for enough traffic control. There is too little traffic control provision within the ten mile EPZ. The personnel to handle this have not been selected, and the sheriff does not have enough on his staff to do this. The personnel do not know what their duties will be.
5. The plan does not specify the type of equipment that will be needed at the road blocks and at traffic control locations.
6. The sheriff has not assigned any person to be responsible to control access to the County Courthouse and County EOC during an emergency. There is no

provision for the absence of the person designated or for relief of the person or persons responsible.

7. The sheriff does not have enough personnel to secure the evacuated area on a 24 hour per day basis. The plan must specify who will be responsible for it and details of what will be done.

8. The plan does not specify what the sheriff is to do if he is not able to make the notifications listed in Table 3-1.

9. The plan does not make provision for the absence of both the sheriff and the under sheriff.

10. The present communications equipment of the sheriff does not permit the sheriff to talk with security people at the Wolf Creek Plant.

SECTION 1.2.3

1. The Emergency Preparedness Coordinator has not made any arrangements for shelter for individuals who are evacuated. The plan does not contemplate enough shelter for the residents of the County.

2. The plan should provide more details about how the Emergency Operations Center will be activated.

3. The plan does not indicate what "off site survey information" is; and, therefore, the Emergency Preparedness Coordinator does not know what is to be maintained.

4. There are no details in the plan about what protective actions the Emergency Preparedness Coordinator will assist the sheriff with.
5. It is not specified in detail what the Emergency Preparedness Coordinator is to tell the persons he notifies under Table 3-1. There is no provision about what is to be done if the people cannot be contacted or are not available.
6. The plan does not specify in detail the activities that the Emergency Preparedness Coordinator is to perform in connection with evacuation confirmation. The people needed to handle the confirmation activities have not been selected or trained, and the County Law Enforcement and Fire Department personnel are not adequate to handle the activity. The confirmation process will take too long and thereby increase the potential number of radiological injuries.
7. The plan does not specify in adequate detail the messages that the Emergency Preparedness Coordinator is to verify with Kansas Gas and Electric.
8. The Emergency Preparedness Coordinator has not developed a program to train county personnel in regard to emergency responsibilities. The plan does not contemplate training as many individuals as will actually be needed if the plan is to be implemented.
9. The Emergency Preparedness Coordinator has not made arrangements to coordinate training drills and exercises with KG&E and the State agencies.
10. The plan does not provide who will take over the Emergency Preparedness Coordinator's responsibilities if he is not available or needs to be relieved.

11. The plan does not contemplate how new people will be trained when existing emergency workers leave. There is no provision in the plan to indicate who will actually do the teaching.

SECTION 1.2.4

1. The County Clerk has not provided how he will meet the responsibilities set forth in Section 1.2.4.

2. The County Clerk has not been adequately involved in the preparation of the emergency planning information to be distributed to the public.

3. The plan does not indicate how the County Clerk will decide to issue announcements regarding call up of personnel, protective actions, or news bulletins. His relationship to the other emergency response people in this regard is not specified.

4. The County Clerk has not determined how news bulletins will be forwarded to public shelters and to other agencies that are to receive such bulletins. One telephone number where the public can inquire for information will not be adequate. The plan needs to specify how many numbers and lines will be needed. These numbers should be listed for public use.

5. The plan does not make allowance for the absence of the County Clerk or who will assume his duties when he is relieved.

SECTION 1.2.5

1. The County Engineer has more responsibilities than he will be able to handle.
2. The plan does not indicate in detail how the County Engineer will get information about road conditions.
3. The plan does not specify the priority for the cleaning of evacuation routes.
4. The County Engineer does not have enough personnel and equipment to clear evacuation routes in a reasonable amount of time.
5. The County Engineer does not have enough personnel, vehicles, equipment, and barricades to handle the road blocks required under the provisions of the plan.
6. The plan does not indicate how a status log for each road block will be maintained.
7. The Engineer has not obtained the resources needed to set up barricades for 24 hours per day following an evacuation. There is not enough communications equipment for use at the roadblocks.
8. The plan does not detail how many individuals will need transportation assistance that the County Engineer is to provide for an evacuation. There is inadequate detail about how the Engineer will know who to evacuate.

9. School buses will not be available to the Engineer because they will be used to evacuate children. The Engineer has not made arrangements to obtain the school buses. Also, there is no provision for enough telephone lines for people calling for evacuation transportation.

10. The plan does not make allowance for the fact that the Engineer and the Shop Foreman may both be unavailable at the same time.

11. The Engineer does not have control over fire personnel. Therefore, he will not be able to direct them in regard to transporting individuals who do not have a private automobile. Also, the fire personnel will have other duties that will prevent them from assisting with transportation.

SECTION 1.2.6

1. There is no agreement between the County and the fire departments about the use of fire department vehicles for decontamination responsibilities.

2. There are not enough fire department vehicles available to meet the decontamination of vehicles responsibility. Also, the fire department personnel and equipment may be needed elsewhere at the same time they are needed for decontamination purposes.

3. The plan does not specify who to notify if a fire chief is not available.

4. It is not specified what the fire chiefs of the various cities are to do when they are notified.

5. The fire leader does not have the knowledge or the authority needed to shut off natural gas and electric service.

6. The plan does not provide the details about how the fire personnel will handle decontamination or about how they will be trained to do this.

SECTION 1.2.7

1. The plan does not detail what type of health services will be provided for persons who are in institutions or under care on an outpatient basis prior to the accident. It does not specify which hospital they will be taken to. The plan does not consider the number of patients to be cared for.

2. The County Health Officer has not organized or trained volunteer teams to provide medical care and first aid.

3. Arrangements have not been made to provide timely medical care to persons who receive radiation injuries. This should require a very substantial number of emergency medical workers. Arrangements must be made in advance with hospitals outside the evacuation area to treat these people.

4. The County Engineer and the Coffey County Ambulance Service do not have sufficient transportation for sick and injured patients in the health institutions within Coffey County. The County Engineer will not be able to provide this because of other duties that he has in the time of an emergency.

5. The Coffey County Hospital Administrator has not obtained a list of the State's hospitals able to handle contaminated patients. Additionally, the plan is not designed to deal with a significant number of radiological injuries.

6. The County Health Nurse has not compiled a list of county residents who are shut-ins or who may need special evacuation assistance. The plan does not make adequate provision for preparing such a list or updating it when changes occur.

SECTION 1.2.8

1. The Shelter Leader has not made any request for assistance from the Red Cross for the establishment of shelters for evacuated people. The Red Cross does not have enough such facilities, and no Red Cross person is designated to deal with the Shelter Leader.

2. There are no personnel trained or designated to assist the Shelter Leader in the management of shelters. There is no provision for the type of services that will be provided at a shelter. The plan is deficient because it does not contemplate providing enough shelter for the number of people that will be evacuated.

SECTION 1.2.10

1. The Radiological Defense Officer does not have sufficient knowledge of the plan to carry out his duties.

2. The Radiation Monitoring Team has not been recruited, and therefore, not trained.
3. The plan is deficient because it does not specify the type of training and a sufficient amount of training for radiological monitoring team members.
4. The plan is deficient because it does not detail the manner in which the county radiological monitoring efforts will be coordinated with the Kansas Department of Health and Environment and Division of Emergency Preparedness Radiological Monitoring efforts.
5. The Coffey County radiological monitoring equipment is not sufficient, and there are not personnel qualified to operate this type of equipment.
6. There is no plan specified for issuing dosimeters and equipment to County emergency workers.
7. The detail of the duties required of the Radiological Defense Officer during an accident are not sufficiently specified.
8. The plan is deficient in that it requires the Radiation Monitoring Team to do off site monitoring and sample collection at the same time that it would be doing decontamination activities and monitoring.
9. There is no person designated or trained to act for the Radiological Defense Officer if he is not available or is to be relieved during an accident.

10. The plan is deficient because it does not state how many members of the Radiological Monitoring Team will be required.
11. The plan is deficient because it does not adequately indicate the number of dosimeters and other types of equipment that will be needed to be issued to County emergency workers.
12. The 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.
13. The Radiological Defense Officer has not developed a system for controlling radiological exposure of emergency workers.

SECTION 1.3

1. The plan is deficient because it places the County Clerk above the Emergency Preparedness Coordinator in the chain of command and line of succession.
2. The plan is deficient because it does not provide how the Emergency Response Organization will function if the Coffey County Courthouse Center must be evacuated.

SECTION 1.4.1

1. The plan is deficient because it does not describe the resources of the State of Kansas that are available to the Emergency Response Organization and how they will be made available to the Emergency Response Organization.

SECTION 1.4.3

1. The plan is deficient because the federal and state agencies responsible for John Redmond Reservoir do not have plans for distributing emergency planning information, evacuation confirmation, access control, and warning and notification of the transient populations at the reservoir.
2. There are no detailed letters of agreement between the County Emergency Response Organization and those agencies responsible for evacuation of John Redmond transients.
3. There is no indication how the John Redmond agencies will coordinate their response to an accident with the response by Coffey County.

TABLE 1-1

1. The plan is deficient because the table and other parts of the plan do not make it clear whether the sheriff or the County Commissioners are responsible for making a decision about evacuation.
2. The table is in conflict with other provisions of the plan because it indicates the Health and Medical Management Team will be responsible for environmental advisories. Other parts of the plan indicate that the Public Information Officer will be responsible for this.
3. The table provides that there will be personnel evacuation, but there is no detail about this in the plan itself. There should be criteria specified so

that the person responsible for making this decision will know when and how to do it.

4. The plan is deficient because it does not specify where and how other law enforcement agencies will assist in the control of evacuation routes; and there will not be enough personnel from these other agencies to adequately control the routes.

5. The plan is deficient because it specifies that the County Engineer will be responsible for rescue in the evacuated area, but there is no detailed plan about how he will be able to do this when he has so many other responsibilities. None of his people are trained to do this.

SECTION 3.2

1. The format and content of the notification message by KG&E has not been determined by the Sheriff, Emergency Preparedness Coordinator, and KG&E.

2. The plan is deficient because it does not clearly define who will decide which of the protective actions in Section 3.0 will be implemented. It is too vague to say that the "Emergency Response Organization will decide".

3. The plan is deficient because it does not specify how the County Sheriff will contact the schools in the 10-mile EPZ if there is an emergency. Telephones may not be sufficient because they could be busy because of the accident.

4. There is no indication that radio station WREN in Topeka has the details of the plan and will know how to respond if it receives an emergency message from the public information officer.
5. Tone alert radios have not been available to county residents who will not be able to hear the sirens when they are evacuated. The plan does not indicate how many of the tone alerts will be required.
6. The plan is deficient because it does not indicate who will decide which of the messages listed in Table 3-2 will be used.
7. The plan is deficient because it does not make any provision for notifying persons who because of occupation, deafness, or other reasons, cannot hear the siren or the tone alerts.
8. The plan is deficient because it is not possible under the plan to notify 100% of the population within five miles of the site within a fifteen minute period, and it is not possible to assure 100% coverage within 45 minutes for those persons who do not receive the initial notification and are within the ten mile EPZ and Coffey County.
9. The plan does not provide how the U.S. Army Corp of Engineers, U.S. Fish and Wildlife Service, and the Kansas Fish and Game Commission will notify persons within their respective jurisdictions. Also, there is not adequate provision made for how the sheriff will notify those organizations when the warning function is activated.

10. The sirens that are installed for warning purposes will not cover the entire emergency planning zone or all of Coffey County under all circumstances, and the plan contemplates evacuation of all of Coffey County. There is no provision about how to make the warning if one or more sirens fail to operate.

11. The provision to notify the hospitals and nursing homes is not adequate because the Emergency Preparedness Coordinator will be too busy with other duties to do this, and telephone communications will be difficult because the lines will be busy. No other means of communication is provided for.

12. The plan makes no recommendation about how an up to date list of those needing tone alerts will be maintained, and there is no provision for testing or maintenance of the tone alerts.

13. The sheriff's office does not have enough people to provide follow up warning to those who do not hear a siren, tone alert, or other warning device.

SECTION 3.3

1. The plan is not precise about which evacuation routes that people in various subzones will follow.

2. Because there are not enough law enforcement people for traffic control, too many people may use one evacuation route and not the one they are suppose to. This will substantially increase the evacuation time.

3. The capacity of the evacuation routes is over stated.

4. Table 3-5 is not sufficient because it does not include an evacuation during a winter night under adverse weather conditions.
5. If there are 10,000 visitors at John Redmond Reservoir, the evacuation time for the plan is too long and too many radiation injuries will occur.
6. The plan does not provide estimated evacuation time for individuals who do not have their own private automobiles for transportation. There is no estimate of evacuation time for them, but it will be too long and too many injuries will result.
7. The plan is deficient because it does not consider what happens if evacuation routes are blocked or if the condition of the roads will not allow car speeds in excess of 20 mph.
8. The plan is deficient because it places too great a reliance on shelter when a greater effort should be made to provide for evacuation. There is no provision for the evacuation of pregnant women and small children even if shelter is considered for others.
9. There is no reasonable means provided for conducting a house to house search of the evacuated area. The Emergency Preparedness Coordinator will not have enough people to do this, and the plan does not adequately specify who or how many people will be involved in this part of the plan.
10. The amount of time estimated for the house to house confirmation search is too long; it must be done in a shorter period of time.

11. The plan is deficient because the evacuation routes send the evacuees down wind and create greater risk to them in many instances. The plan needs to give adequate consideration to wind directions and possible changes in wind direction during an evacuation.

SECTION 3.3.1

1. The plan is deficient because there are not enough school buses available to evacuate the students. Also, the plan does not make provision for buses not being available at the time of evacuation.
2. The teachers, school administrators, and children have not been trained about how to handle the evacuation, and there are no plans in the plan to specify how they will be instructed to deal with an emergency evacuation.
3. The County Engineer does not have the means to provide transportation assistance to school districts who will need additional transportation in the event of an evacuation.
4. The plan is deficient because it does not specify how the sheriff's office will contact the schools to advise them of an evacuation. Provision for other than telephone communication should be detailed in the plan.
5. The plan is deficient because it provides that students will be taken home if road conditions permit and there is a shelter advisory. It will take too long to get the children home, and no one may be at home at that time.

6. The plan is deficient because in Section 3.3.1 the Public Information Officer will advise the parents where children have been evacuated to. This information should have been supplied to the parents at an earlier time. The plan does not make provision for providing such information.

7. The plan is deficient because it does not make provision to train the bus drivers and to assure that they will respond.

SECTION 3.3.2

1. The details of how the Health and Management Team will provide transportation and alternate facilities for patients at hospitals and nursing homes is not specified and is therefore inadequate.

2. No one has contemplated how the Health and Medical Management Team will arrange with families to pick up patients who can be discharged. There is no provision to deal with a situation when family members are not available.

3. The County Engineer does not have the equipment or personnel needed to evacuate Coffey County hospital patients.

4. The plan is deficient because the Health and Management Team is supposed to have access to the Coffey County Ambulance Service, but there is no provision about what to do if the Coffey County Ambulance Service is required to assist with other duties during an evacuation.

5. The plan is deficient because it indicates that the patients at hospitals and nursing homes may have their evacuation delayed or postponed until dose rates of radiation at the facility result in projected doses for evacuation. There is no means to check when the dose rates reach such a level and such a concept endangers the patients.

SECTION 3.4

1. The plan is deficient because the Public Information Officer has the authority to issue news bulletins on the status of Coffey County's actions as he sees fit. Bulletins should only be issued after approval by the County Commissioner.

2. The plan is deficient because the Public Information Officer is located at the Wolf Creek Generating Station Emergency Operations Facility. It will be necessary for the Public Information Officer to work closely with County officials. Therefore, he ought to be located in the County Emergency Operations Center.

3. The plan is deficient because it does not state how emergency information and instructions will be coordinated with the Kansas Division of Emergency Preparedness and the Department of Health and Environment.

4. The plan is deficient because to the extent that it relies on the Emergency Broadcasting Service, it will not provide information to individuals who do not have access to television or radio.

SECTION 3.5

1. Because of other duties, the County Engineer will not be able to provide the emergency transportation in the event of an evacuation.
2. There are not enough vehicles available to pick up persons who call in stating that they have no transportation out of the area to be evacuated.
3. 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.
4. The plan is deficient because the school buses listed in Table 3-8 will be required for evacuation of school children and will not be available to provide other emergency transportation.
5. The plan is deficient because the County Health Nurse will not be able to adequately identify in advance those persons who will require special emergency transportation. There is no provision made to update the list as changes occur. There is not enough equipment and personnel available to provide the transportation contemplated by Section 3.5. The plan is deficient because it does not estimate how many buses or people will be required to provide the transportation.

SECTION 3.6

1. The sheriff does not have the equipment or personnel available to handle access control to the area evacuated.

2. The plan is deficient because it does not provide that the entire evacuated area will be blocked. It only contemplates that it will be blocked as resources become available.

3. The County Engineer does not have sufficient personnel to supplement or relieve the sheriff's office personnel. The plan should specify how many people will be required and the equipment that will be required to maintain access control.

4. The plan is deficient because it does not clearly define what "access control" is and what the overall responsibilities of the access control personnel are. The plan is not sufficient because it does not contemplate the amount of resources that will be required from the state to assist with access control. Because the Radiation Monitoring Team may be required to do other things, it will not be possible for it to provide dosimetry for access to an exit from the evacuated area.

SECTION 3.7

1. The plan is deficient because the personnel from the Kansas Bureau of Radiation Control are not adequately trained to determine if there will be offsite contamination.

2. The plan is deficient because it does not require that all evacuees go to the designated shelter area outside the evacuation zone for a contamination check. Once the evacuees are out of the area, it will not be possible to adequately notify them to go for a contamination check.

3. The fire leader does not have enough trucks and personnel to conduct the decontamination activities.
4. The plan does not contemplate an adequate number of radiation monitoring personnel so that such personnel can be dispatched to the evacuation shelters to check for contamination.
5. The plan is deficient because it contemplates the impoundment of automobiles. There is nothing in the plan that indicates to the public that this will occur or there is no adequate provision to deal with situations where the public does not want to have the vehicles impounded.
6. There is no provision in the 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.
7. The time required to provide radiation monitoring of evacuees at shelters will be greater than estimated. It will not be possible to use all the County's radiation monitoring equipment because it will be needed elsewhere. The time is in excess of the time allotted by NUREG 0654.
8. There are not enough personnel assigned to handle the radiation monitoring check. The plan does not specify how they will be recruited and trained.
9. The 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.

10. The plan is deficient because it does not provide for disposal of contaminated equipment, vehicles, decontamination water, or any other materials that might be contaminated.

SECTION 3.8

1. The plan is insufficient because it does not contemplate shelter for all of the people to be evacuated from the emergency planning zone or in Coffey County. Not enough shelter sites have been specified.

2. The plan is not specific about where people will go when they reach the city designated as an evacuation shelter site.

3. The temporary managers of each shelter have not been selected or trained.

4. The plan does not provide details about the extent of the resources required for food, sleeping, safety, health and sanitation, communications, recreation and religious affairs.

5. The plan is deficient because it does not make any specific reference to how individuals who are separated because they have not passed a check for contamination will be handled and treated.

6. There are no details of plans or agreements about plans with the Red Cross or the State Department of Social and Rehabilitation Services.

7. The plan is deficient because the shelters may be down wind from the Wolf Creek Plant site and this could cause additional radiation injuries.
8. There has been no provision made about paying shelter owners for the use of their site or services. The plan does not adequately contemplate a lengthy shelter.

SECTION 3.9

1. Even though Coffey County Emergency workers are supposed to have self-reading dosimeters, the State and Coffey County have not made provision for these dosimeters, and the plan does not contemplate enough of them to be available for each of the workers.
2. The workers do not have any training program organized to teach them how to use the dosimeters.
3. The plan is deficient because it does not make specific enough details about how the doses received by emergency workers will be recorded and monitored.
4. The Emergency Preparedness Coordinator is not trained to properly implement the guidelines to be used to determine when emergency workers should conduct activities that will result in exposures in excess of 25 REM.
5. The plan is deficient because emergency workers will be likely not to respond when they are advised about the effects of large doses of radiation. The training and explanation of this are not specified in the plan.

6. The plan does not specifically detail how many dosimeters will be needed and what kind will be used.
7. The plan does not specifically specify how the Coffey County Emergency workers will be issued the dosimeters.

SECTION 3.10

1. The Radiation Monitoring Team will not be able to conduct monitoring surveys, if at the same time it is to be monitoring evacuees for radiation at the evacuation centers.
2. The responsibilities between the Kansas Department of Health and Environment and the Kansas Division of Emergency Preparedness and the Coffey County Radiation Monitoring Team are not clearly specified. There must be such specificity or the monitoring may not be carried out as required.
3. The plan contemplates that radiation monitoring 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.
4. The 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.

5. The plan indicates that the Radiation Monitoring Team personnel can be on the scene within 45 minutes after notification. This is too long a period. Also, the plan does not contemplate what to do if members of the team are not available.

6. The Radiation Monitoring Team does not have the equipment that is needed to adequately detect radiation and there are no details about training the team to use the equipment.

TABLE 3-2 (Sheet 6 of 15)

1. The instructions indicate that they are to stay in the house until official notice is received that it is safe to go out. The plan is deficient because it does not detail how and who will decide when it is safe to go out. Specific guidelines need to be set forth. Additionally, the plan is deficient because it does not contemplate how to evacuate after there has been a period of shelter.

TABLE 3-2 (Sheet 8 of 15)

1. The plan is deficient because it does not indicate where pregnant women and preschool age children will go if they are evacuated before others. Also, the plan does not provide for transportation for these people. If buses or other means of transportation are used for them, then that transportation might not be available to others when there would be a full evacuation. Evacuation routes are not specified.

TABLE 3-2 (Sheet 9 of 15)

1. There is no provision about how the local residents who will need the thyroid blocking agent will be contacted, and no one in the plan has a responsibility for this. Also, there is no provision about how it will be decided which of the local residents are the ones to receive the blocking agent. There are no specifications in the plan for deciding about which emergency workers will receive a blocking agent. Also, there is no provision to deal with individuals who hear the announcement and want to receive the blocking agent. Those who are to receive the drug should be identified in advance.

TABLE 3-2 (Sheet 11 of 15)

1. The instructions in the sheet are not consistent with the plan or sheet 12 of 15. The sheet indicates that people may stay with friends or relatives rather than going to the evacuation area. The plan indicates that everyone will proceed to the evacuation areas.

TABLE 3-2 (Sheet 12 of 15)

1. The details about the evacuation routes and sectors will be too long and confusing. People will, therefore, not follow the instructions.

TABLE 3-5

1. The plan is deficient because it does not provide evacuation time estimates for a winter night evacuation under average or adverse weather, and it does not provide for a summer night evacuation under adverse weather conditions.

2. Evacuation times for an evacuation on a winter day under average weather conditions and under adverse weather conditions are virtually identical. This is not realistic and therefore the plans are deficient.

3. NUREG 0654 indicates that plans should contemplate that releases after an accident occurs at the site can begin within one-half hour and spread to over five miles in 0.5 - 2 hours and to 10 miles in 1 - 4 hours: the evacuation times indicate that many people will not be evacuated within those time limits. Therefore, they can receive serious radiation exposure and injuries. The plan does not adequately consider how this kind of situation will be handled and the consequences of it.

TABLE 3-6

1. The evacuation confirmation time parameters indicate that the confirmation will not be completed for up to 10.5 hours. This means that some individuals will not be out before then. The time is too long and must be reduced if injuries are to be minimized.

SECTION 4.1

1. The plan is deficient because it does not provide for relocation of the Coffey County Emergency Operations Center in the event that it becomes necessary to evacuate it. It is unlikely that people will want to remain in the Emergency Operations Center when other offices in the Courthouse have radiation levels that are unacceptable.

2. 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.

SECTION 4.2.1

1. The telephone system will not be adequate. There will not be enough lines in the event of an emergency.

SECTION 4.2.2

1. The County Sheriff's radio communications system is not adequate to cover all of Coffey County or to talk with the Wolf Creek Plant.

SECTION 4.3.1

1. The 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.
2. There is no provision in the plan for how the monitoring kits and the equipment in them will be distributed.
3. There is no adequate provision for insuring that the radiation monitoring equipment is properly tested and maintained so that it will be in working condition at the time of the emergency.

SECTION 5.1

1. There is no adequate arrangement between Coffey County and the State to provide radiological emergency response training for State and local emergency organization personnel.
2. The Coffey County Emergency Preparedness Coordinator has not made adequate plans to hold training sessions to familiarize Coffey County personnel with the plan and their responsibilities. There must be some assurance in such a program that the Emergency Preparedness Coordinator knows that the individuals understand their responsibilities and that they are adequately trained.
3. The training program does not adequately consider how to deal with changes in personnel and in volunteers who are trained. There will be a very substantial turn over that must be dealt with.
4. The plan should specify in detail the type and amount of training that individuals will receive.
5. The Coffey County Emergency Preparedness Coordinator is not prepared to conduct annual training sessions reviewing the elements of the plan and the responsibilities of each position. Inadequate consideration has been given to the amount of time that this will take and the imposition it places upon the Emergency Response personnel.

SECTION 5.2

1. The planning for the drills and exercises by Coffey County is not adequate.
2. The details of the drills should be specified in the plan and there should be specifics about the goals of the drills so that the Emergency Response Coordinator can measure the results to determine if the personnel and equipment are adequate to deal with an emergency.

SECTION 5.3

1. The plan indicates that the Public Information Officer will engage in "several activities" to assure that emergency planning information is easily accessible to the general public. This is too vague and the activities should be specified in detail.
2. The public information and emergency planning education materials should be set forth in the plan. The plan should provide methods by which it can be determined if the public is aware of the information and if they understand how they are to respond in the event of an emergency.
3. There is no detail about how the education information will be provided to transients at John Redmond Reservoir and in other parts of the County.

TABLE 5-1

1. The training to be provided to the positions listed in the table should be specified in detail. Allowances must be made for the time and costs involved in providing such training.

STATE OF KANSAS PLAN

TAB A

1. The State of Kansas is supposed to be able to supplement Coffey County Emergency Services but the State personnel who would be doing this are not familiar with the Coffey County Plan. They will not know how to work with the county plan. Many of these state people are not adequately trained to respond to radiological emergencies.
2. The State radiation monitoring equipment is not sufficient to deal with the type of emergency that can occur at Wolf Creek
3. The State plan should detail how many people and how much equipment are needed to respond to the emergency at Wolf Creek
4. The State indicates that it will implement training programs for emergency workers, but it will not be able to do so because the people to provide the training have not been selected and the training courses are not developed.

TAB B

1. The State plan says that the Governor can order an evacuation. On the other hand, the Coffey County Plan says that Coffey County will decide about an evacuation. The plans must be made consistent in regard to this responsibility. Also, other responsibilities delegated to the Governor are in conflict with the Coffey County Plan.

2. The Kansas Department of Health and Environment is not familiar with the State Plan or the Coffey County Plan. Therefore, it can not meet its primary and support responsibilities. It does not have adequately trained personnel to provide the responsibilities specified in the State Plan.
3. The State Department of Transportation personnel are not trained or equipped to perform responsibilities specified in the State Plan.
4. The Kansas Highway Patrol personnel are not sufficient in number nor trained or equipped to carry out all the responsibilities specified in the State Plan.
5. According to Figure B-2, the decision about evacuation is the primary responsibility of the Division of Emergency Preparedness. This conflicts with other parts of the State Plan which indicates the Governor will make the decision, and it conflicts with the Coffey County Plan.
6. The Kansas Department of Health is not prepared to provide the primary responsibility for adequate medical emergency services as specified in Figure B-2.

TAB C

1. The Kansas Chapter of the American Red Cross is not adequately staffed or equipped to provide the tasks specified in Section 3.2 of Tab C.

TAB G

1. The State and the Coffey County Plan are deficient because they do not make it clear who has the responsibility for issuing public information releases. Also, the duties of the State Public Information Officer will conflict with those of the Coffey County Public Information Officer in relation to the issuance of public information releases about an emergency.

TAB H

1. The emergency equipment described in Section 1.6, page H-5, of the State Plan will not be adequate to handle an emergency. More equipment will be required. Also, none of the equipment is located in Coffey County and will not be available to Coffey County emergency personnel in a short enough period of time.

TAB I

1. The State radiation monitoring duties and the Coffey County radiation monitoring duties are not clearly specified. In some instances, the two plans conflict about who has the responsibility. This will cause confusion about the precise duties of each when it will be important that they be carried out promptly and without confusion.

TAB J

1. The State Plan makes reference to the distribution of potassium iodide for emergency workers and special immobile population. The State Plan is

deficient because it does not outline in sufficient detail how the potassium iodide will be distributed. The people to whom it is to be distributed will not be known in advance. The plan does not make any assurance that the potassium iodide will be available at the time it is needed. Additionally, the Coffey County plan is deficient because it does not make adequate plans for distribution of potassium iodide to emergency workers or others.

TAB K

1. The State Plan does not assume all evacuees will be checked for contamination. The Coffey County Plan does so. It must be clear in the plans that all evacuees will be checked for contamination.

TAB N

1. The State Plan provides that all major components of emergency response plans will be tested by an exercise over a five year period. This is not often enough.

TAB O

1. The State does not have adequate plans to train state personnel having emergency responsibilities. For example, the Bureau of Radiation Control is responsible for supporting and developing conduct of radiological emergency response training but has not established plans or courses for providing such training.

2. The State Plan talks about annual retraining programs that will be prepared for state emergency response personnel. These programs have not been prepared and the personnel have not been trained. Also, only "selected state and local emergency response personnel" will receive the initial forty hour course designated to accomplish the training objectives of the State. All such personnel should receive this training or at a minimum the number and types of personnel who will receive the training should be specified in the State Plan.

EP/FQ As stated in the Prehearing Conference Order, the intervenors expect to call the following witnesses. The numbers listed after each witness refer to the contentions listed in the Intervenors' Proposed Stipulation of Contentions.

a. The following Coffey County employees:

1. Health Officer: 1, 2, 3, 4, 6 - 11, 13, 14, 17 - 20.
2. Sheriff's Dispatcher: 1, 2, 5, 6, 7, 10, 13, 14, 16 - 19.
3. Undersheriff: 1, 2, 4 - 10, 12 - 19.
4. Shelter Manager: 1 - 4, 6 - 8, 10, 12, 13, 17, 19, 20.
5. Shelter Leader: 1 - 4, 7 - 10, 13, 17, 18 - 21.
6. Radiological Defense Officer: 1 - 14, 17 - 21.
7. County Engineer: 1 - 14, 16 - 20.
8. County Nurse: 1, 2, 4, 7, 10, 13, 16, 17, 19, 20.
9. School Superintendents: 1 - 4, 6 - 10, 12 - 20.
10. County Commissioners: 1 - 21.

b. Other government employees as follows:

1. Fire Chiefs: 1 - 4, 7, 10, 13, 16 - 19.
2. Manager of John Redmond Reservoir (Corps of Engineers): 1 - 10, 12 - 20.
3. Employees of U.S. Fish and Wildlife Service: 1 - 10, 12 - 20.
4. Employees of Kansas Fish and Game Commission: 1 - 10, 12 - 20.
5. Burlington Police Chief: 1 - 4, 6 - 10, 13 - 20.
6. Other Police Chiefs in Coffey County: 1 - 4, 6 - 10, 13 - 20.
7. Employees of Kansas Department of Health and Environment: 1, 2, 4, 6, 8, 9, 10, 12, 13, 17 - 21.
8. Employees of Kansas Department of Social and Rehabilitation Services: 1 - 4, 10, 12, 13, 17, 19, 20.
9. Highway Patrol: 1, 2, 4, 6, 9, 10, 12, 13, 14, 16 - 20.

c. Other witnesses as follows:

1. Hospital Administrator for area hospitals: 1 - 4, 6 - 11, 13, 14, 15, 17, 19, 20.
2. Head of Coffey County Ambulance Service: 1 - 4, 6 - 14, 17, 19, 20.
3. Administrators of Nursing Homes in Coffey County: 1 - 4, 6 - 10, 13, 14, 15, 17, 19, 20.

d. Expert witnesses to testify concerning the following:

1. Time necessary for evacuation: 4, 5, 6, 8 - 17, 20.
2. Radiological Injuries: 4, 5, 6, 8 - 11, 13, 14, 20.
3. Weather and climatic conditions: 5, 6, 9, 10, 11, 14.
4. Psychological reactions of emergency workers: 5, 6, 8, 9, 10, 15.
5. Response of the general public to an emergency: 5, 6, 8, 9, 10, 15.
6. Dr. Jacob Frenkel: 5, 11.

As of this time, the witnesses will testify in regard to the contentions listed for each; however, the testimony to be prefiled before the hearing may include testimony on contentions not listed.

General Interrogatories (First Set).

1. The intervenors have also relied on the latest plans submitted by Kansas Gas and Electric Company, Coffey County, and the State of Kansas.

This is the intervenors' revised answer to Interrogatory 31 (Applicants' Second Set of Interrogatories):

31 (a) Weather conditions will have greater impact on evacuation route selection, evacuation shelter center location, and siren (alert) warnings, and radiological injuries than the plans contemplate.

(b) Evacuation routes and evacuation shelter centers are located downwind from the plant site. The ability to hear sirens will be effected by wind direction and velocity and by rain and snow. The number of radiological injuries that will occur will be effected by wind, rain, and atmospheric conditions.

(c) Alternate evacuation routes and evacuation centers should be selected that are not downwind. Alerting should not rely so much on sirens. Plans should be made for more injuries than the plans contemplate.

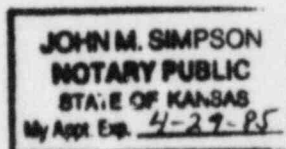
The answers set forth above on pages 1 to 50 are based on the information available to us at this time. If further information becomes available to us, we reserve the right to supplement or amend these answers, and to the extent required to do so will supplement or amend these answers. Signed this 6th day of April, 1983.

Mary Ellen Salava
Mary Ellen Salava

Wanda Christy
Wanda Christy

STATE OF KANSAS, COUNTY OF JOHNSON:

On this 6th day of April, 1983, Wanda Christy and Mary Ellen Salava appeared before me and being first duly sworn made and signed the above answer under oath.



John M. Simpson
Notary Public

(Seal)