

HUNTON & WILLIAMS

ATLANTA, GEORGIA
BRUSSELS, BELGIUM
FAIRFAX, VIRGINIA
KNOXVILLE, TENNESSEE

RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET

RICHMOND, VIRGINIA 23219-4074

TELEPHONE (804) 788-8200

FACSIMILE (804) 788-8218

NEW YORK, NEW YORK
NORFOLK, VIRGINIA
RALEIGH, NORTH CAROLINA
WASHINGTON, D. C.

DONALD P. IRWIN

File No. 36769.000005

Direct Dial No. (804) 788-8357

April 25, 1991

50-482

Joseph Rutberg, Esq.
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Kansas Gas and Electric Company
(Wolf Creek Generating Station):
NRC Operating License NPF-42

Dear Joe:

In connection with the Staff's continuing review of KG&E's request for permission to transfer its interest in the Wolf Creek POL in connection with its merger with KPL, I enclose one copy of the prefiled rebuttal testimony recently submitted on behalf of the staff of the Missouri Public Service Commission in its proceedings on the merger. It consists of filings by the following witnesses:

Kimberly A. Dismukes
David H. Downes
Cary G. Featherstone
Raymond S. Hartman (with attached report)
Susette N. Long
Jay W. Moore
David J. Ravenscraft
Robert E. Schallenberg
Steve Traxler

I believe you will find that virtually all of these submissions treat financial issues associated with the merger, rather than competition-related ones. I forward them pursuant to KG&E's policy of ensuring that the Staff receives potentially relevant information of record. I hope that you will find them of aid to the Staff in resolving competition-related issues associated with the transfer application and related license amendment. Please call me with any

9105030043 910425
PDR ADDCK 05000482
T PDR

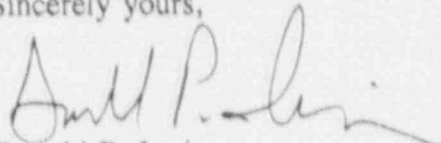
DFOL 1/1 per
Dana
Pickett

HUNTON & WILLIAMS

Joseph Rutberg, Esq.
April 25, 1991
Page 2

questions. KG&E remains interested in resolving all outstanding issues successfully with the Staff at the earliest possible time.

Sincerely yours,



Donald P. Irwin
Counsel for Kansas Gas and
Electric Company

Enclosure

cc w/o enclosure: Edwin J. Reis, Esq. (OGC)
Darrel A. Nash (NRR)
William M. Lambe (NRR)
Robert D. Martin (Region IV)
Douglas V. Pickett (NRR) ✓
Secretary of the Commission
Richard D. Terrill, Esq. (KG&E)
Martin J. Bregman, Esq. (KPL)
Samuel Cowley, Esq. (KCPL)
Harold L. Haun, Esq. (KEPCo)
Warren B. Wood, Esq. (WCNOC)