

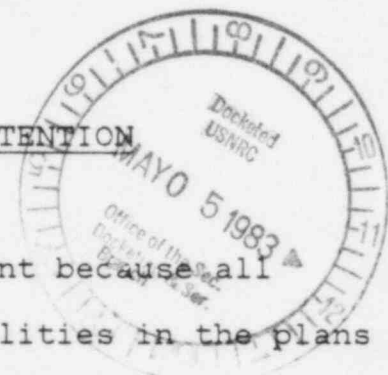
PROPERTY OF
PROD. & UTIL. SEC.

50-432

RELATED CORRESPONDENCE

ATTACHMENT "A"

ALTERNATIVE EVACUATION PLAN CONTENTION



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. Specifically:

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. (C §1.1, #1).1/
2. The Radiological Defense Officer does not have sufficient knowledge of the plan to carry out his duties. (C §1.2.10, #1.)
3. The Kansas Department of Health and Environment is not familiar with the State Plan or the Coffey County Plan. Therefore, it cannot meet its primary and support responsibilities. It does not have adequately trained personnel to provide the responsibilities specified in the State Plan. (S Tab B, #2.)

1.b. In many instances, personnel who are to perform a function have not been selected. Specifically:

1/ The reference at the end of each specific contention is to either the County ("C") or State ("S") plan, the section of that plan, and the asserted deficiency in that section as identified in Intervenor's Amended and Supplemental Answers to Applicants' Interrogatories to Intervenor's, served April 6, 1983, pp. 12-48.

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1. The shelter managers at the evacuation centers have not been designated and selected. (C §1.1, #2.)
2. No person is designated as the leader of the Health and Medical Management Team. (C §1.1, #3.)
3. The shelter leader has not been selected. (C §1.1, #6.)
4. No radiation monitoring team has been selected. (C §1.1, #8.)
5. 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, #6.)
6. The people needed to handle the confirmation activities have not been selected. (C §1.2.3, #6.)
7. The County Health Officer has not organized volunteer teams to provide medical care and first aid. (C §1.2.7, #2.)
8. No Red Cross person is designated to deal with the Shelter Leader. (C §1.2.8, #1.)
9. There are no personnel designated to assist the Shelter Leader in the management of shelters. (C §1.2.8, #2.)
10. The Radiation Monitoring Team has not been recruited. (C §1.2.10, #2.)
11. The temporary managers of each shelter have not been selected. (C §3.8, #3.)

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

Specifically:

1. The fire leader does not have the knowledge or the authority needed to shut off natural gas and electric service. (C §1.2.6, #5.)
2. 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. (C §1.2.7, #6.)

3. The Shelter Leader has not made any request for assistance from the Red Cross for the establishment of shelters for evacuated people. (C §1.2.8, #1.)
4. The Radiological Defense Officer has not developed a system for controlling radiological exposure of emergency workers. (C §1.2.10, #13.)

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. Specifically:

1. 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. (C §1.2.2, #3.)
2. 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. (C §1.2.2, #8.)
3. The plan should provide more details about how the Emergency Operations Center will be activated. (C §1.2.3, #2.)
4. 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. (C §1.2.3, #3.)
5. There are no details in the plan about what protective actions the Emergency Preparedness Coordinator will assist the Sheriff with. (C §1.2.3, #4.)
6. 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. (C §1.2.3, #5.)

7. The plan does not specify in detail the activities that the Emergency Preparedness Coordinator is to perform in connection with evacuation confirmation. (C §1.2.3, #6.)
8. The plan does not specify in adequate detail the messages that the Emergency Preparedness Coordinator is to verify with Kansas Gas and Electric. (C §1.2.3, #7.)
9. The County Clerk has not provided how he will meet the responsibilities set forth in Section 1.2.4. (C §1.2.4, #1.)
10. The plan does not indicate in detail how the County Engineer will get information about road conditions. (C §1.2.5, #2.)
11. The plan does not specify the priority for the cleaning of evacuation routes. (C §1.2.5, #3.)
12. The plan does not indicate how a status log for each road block will be maintained. (C §1.2.5, #6.)
13. 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. (C §1.2.5, #8.)
14. It is not specified what the fire chiefs of the various cities are to do when they are notified. (C §1.2.6, #4.)
15. The plan does not provide the details about how the fire personnel will handle decontamination. (C §1.2.6, #6.)
16. 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. (C §1.2.7, #1.)

17. There is no provision for the type of services that will be provided at a shelter. (C §1.2.8, #2.)
18. There is no plan specified for issuing dosimeters and equipment to County emergency workers. (C §1.2.10, #6.)
19. The detail of the duties required of the Radiological Defense Officer during an accident are not sufficiently specified. (C §1.2.10, #7.)
20. 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. (C §1.2.10, #12.)
21. The plan is deficient because it does not specify where and how other law enforcement agencies will assist in the control of evacuation routes. (C Table 1-1, #4.)
22. 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. (C §3.3.2, #1.)
23. 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. (C §3.3.2, #2.)
24. 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. (C §3.6, #4.)
25. 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. (C §3.7, #10.)

26. The plan is not specific about where people will go when they reach the city designated as an evacuation shelter site. (C §3.8, #2.)
27. 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. (C §3.8, #4.)
28. 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. (C §3.8, #5.)
29. There are no details of plans or agreements about plans with the Red Cross or the State Department of Social and Rehabilitation Services. (C §3.8, #6.)
30. 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. (C §3.9, #3.)
31. The plan does not specifically detail how many dosimeters will be needed and what kind will be used. (C §3.9, #6.)
32. The plan does not specifically specify how the Coffey County Emergency workers will be issued the dosimeters. (C §3.9, #7.)
33. There is no provision in the plan for how the monitoring kits and the equipment in them will be distributed (C §4.3.1, #2.)

3. The plans make no provisions for paying the cost 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.

Specifically:

1. There has been no provision made about paying shelter owners for the use of their site or services. (C §3.8, #8.)

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. Specifically:

1. 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. (C §1.1, #4.)
2. 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. (C §1.2.2, No. 4.)
3. The plan does not specify the type of equipment that will be needed at the road blocks and at traffic control locations. (C §1.2.2, #5.)
4. The plan is deficient because it does not state how many members of the Radiological Monitoring Team will be required. (C §1.2.10, #10.)
5. 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. (C §1.2.10, #11.)
6. The State plan should detail how many people and how much equipment are needed to respond to the emergency at Wolf Creek. (S Tab A, #3.)

4.b. Frequently, the plans underestimate the number of people that will be required to perform a function. Specifically:

1. The sheriff does not have enough people for the duties at "priority" road blocks. (C §1.2.2, #3.)
2. 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. (C §1.2.2, #7.)
3. The County Law Enforcement and Fire Department personnel are not adequate to handle evacuation confirmation. (C §1.2.3, #6.)
4. The County Engineer does not have enough personnel, vehicles, equipment, and barricades to handle the road blocks required under the provisions of the plan. (C §1.2.5, #5.)
5. There will not be enough personnel from other law enforcement agencies to adequately control the evacuation routes. (C Table 1-1, #4.)
6. The Kansas Highway Patrol Personnel are not sufficient in number to carry out all the responsibilities identified in the State plan. (S Tab B, #4.)

4.c. In many instances, not enough people are available to perform an assigned function. Specifically:

1. The plan does not contemplate enough people to handle the duties required of the radiation monitoring team. (C §1.1, #8.)
2. There are not personnel qualified to operate radiological monitoring equipment. (C §1.2.10, #5.)
3. 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. (C §3.3, #9.)

4. The County Engineer does not have the personnel needed to evacuate Coffey County hospital patients. (C §3.3.2, #3.)
5. The sheriff does not have the personnel available to handle access control to the area evacuated. (C §3.6, #1.)
6. The County 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. (C §3.6, #2.)
7. 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 to maintain access control. (C §3.6, #3.)
8. The fire leader does not have enough personnel to conduct the decontamination activities. (C §3.7, #1.)
9. 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. (C §3.7, #4.)
10. 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. (C §3.7, #6.)
11. There are not enough personnel assigned to handle the radiation monitoring check. (C §3.7, #8.)
12. 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. (C §3.7, #9.)
13. 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 of the State Plan. (S Tab C, #1.)

4.d. The plans do not specify how people who have duties under the plans will be recruited. Specifically:

1. 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. (C §1.1, #5.)
2. The plan does not specify how personnel assigned to the radiological monitoring check will be recruited. (C §3.7, #8.)

4.e. Frequently, the plans require people to perform two functions at the same time. Specifically:

1. The County Engineer has more responsibilities than he will be able to handle. (C §1.2.5, #1.)
2. Fire personnel will have other duties that will prevent them from assisting with transportation of individuals who do not have a private automobile. (C. §1.2.5, #11.)
3. Fire Department personnell and equipment may be needed elsewhere at the same time they are needed for decontamination purposes. (C §1.2.6, #2.)
4. The County Engineer will not be able to provide transportation for sick and injured patients in the health institutions within Coffey County because of other duties that he has in the time of an emergency. (C §1.2.7, #4.)
5. 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. (C §1.2.10, #8.)
6. 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. (C Table 1-1, #5.)

7. 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. (C §3.3.2, #4.)
8. Because of other duties, the County Engineer will not be able to provide the emergency transportation in the event of an evacuation. (C §3.5, #1.)
9. 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. (C §3.6, #4.)
10. 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. (C §3.10, #1.)

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. Specifically:

1. There are no detailed letters of agreement between the County Emergency Response Organization and those agencies responsible for evacuation of John Redmond transients. (C §1.4.3, #2.)
2. There is no indication how the John Redmond agencies will coordinate their response to an accident with the response by Coffey County. (C §1.4.3, #3.)
3. 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. (C §3.3, #5.)

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.

Specifically:

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. (C §1.2.1, #1.)
2. The plan does not establish guidelines and details about how and when a curfew will be imposed by the County Commissioners. (C §1.2.1, #2.)
3. The Coffey County Commissioners do not know 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. (C §1.2.1, #4.)
4. Table 1-1 of the County plan 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. (C Table 1-1, #3.)

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.

Specifically:

1. 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. (C §1.2.1, #5.)
2. 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. (C §1.2.1, #6.)
3. There is no provision for the absence of the person designated to be responsible to control access to the County Courthouse or the County EOC during an emergency, or for relief of the person or persons responsible. (C §1.2.2, #6.)
4. The plan does not make provision for the absence of both the sheriff and the under sheriff. (C §1.2.2, #9.)
5. 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. (C §1.2.3, #10.)
6. The plan does not make allowance for the absence of the County Clerk or who will assume his duties when he is relieved. (C §1.2.4, #5.)
7. The plan does not make allowance for the fact that the Engineer and the Shop Foreman may both be unavailable at the same time. (C §1.2.5, #10.)
8. The plan does not specify who to notify if a fire chief is not available. (C §1.2.6, #3.)
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. (C §1.2.10, #9.)
10. 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. (C §1.3, #2.)

11. The plan does not contemplate what to do if members of the Radiological Monitoring Team are not available. (C §3.10, #5.)
12. 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. (C §4.1, #1.)

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. Specifically:

1. 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. (C §3.9, #5.)

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. Specifically:

1. Table 3-5 of the County Plan is not sufficient because it does not include an evacuation during a winter night under adverse weather conditions. (C §3.3, #4.)
2. The County 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. (C §3.3, #11.)

3. The County plan is deficient because it does not provide evacuation time estimates for a winter night evacuation under average or adverse weather conditions. (C Table 3-5, #1.)
4. 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. (C Table 3-5, #2.)

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 than 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.

Specifically:

1. The plan is deficient because it does not contemplate providing enough shelter for the number of people that will be evacuated. (C §1.2.8, #2.)
2. 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. (C §3.3, #8.)
3. The plan is deficient because it indicates that 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. (C §3.3.2, #5.)

4. The plan does not adequately contemplate a lengthy shelter. (C §3.8, #8.)
5. 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. (C Table 3.2, sheet 6, #1.)
6. 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. (C Table 3.2, sheet 8, #1.)
7. 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. (C Table 3-5, #3.)

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. Specifically:

1. The plan does not contemplate enough volunteers to deal with several hundred or more radiological injuries. (C §1.1, No. 5.)
2. 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. (C §1.2.7, #3.)
3. 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. (C §1.2.7, #5.)
4. The plan is deficient because the shelters may be down wind from the Wolf Creek Plant site and this could cause additional radiation injuries. (C §3.8, #7.)
5. 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. (C Table 3-2, sheet 9, #1.)
6. 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. (C Table 3-6, #1.)

7. The Kansas Department of Health is not prepared to provide the primary responsibility for adequate medical emergency services as specified in Figure B-2 of the State plan. (S Tab B, #6.)

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. Specifically:

1. The County 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. (C §1.2.1, #3.)
2. The County 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. (C §1.4.1, #1.)

12.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. Specifically:

1. The instructions in Table 3-2, sheet 11 (of 15) of the County plan are not consistent with the plan or sheet 12 (or 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. (C Table 3-2, sheet 11, #1.)
2. According to Figure B-2 of the State Plan, 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. (S Tab B, #5.)

3. 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. (S Tab K, #1.)

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. Specifically:

1. The present communications equipment of the sheriff does not permit the sheriff to talk with security people at the Wolf Creek Plant. (C §1.2.2, #10.)
2. 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. (C §1.2.3, #1.)
3. The County Engineer does not have enough personnel, vehicles, equipment, and barricades to handle the road blocks required under the provisions of the plan. (C §1.2.5, #5.)
4. 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. (C §1.2.5, #7.)
5. 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. (C §1.2.5, #8.)

6. There are not enough fire department vehicles available to meet the decontamination of vehicles responsibility. (C §1.2.6, No. 2.)
7. 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. (C §1.2.7, #4.)
8. The Red Cross does not have enough facilities for evacuated people. (C §1.2.8, #1.)
9. The Coffey County radiological monitoring equipment is not sufficient. (C §1.2.10, #5.)
10. 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. (C §3.3.1, #3.)
11. 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. (C §3.5, #2.)
12. 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 §3.5, #3.)
13. The County 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. (C §3.5, #4.)
14. There is not enough equipment and personnel available to provide the transportation contemplated by Section 3.5 of the County plan. The plan is deficient because it does not estimate how many buses or people will be required to provide the transportation. (C §3.5, #5.)
15. The sheriff does not have the equipment available to handle access control to the area evacuated. (C §3.6, #1.)
16. The fire leader does not have enough trucks to conduct the decontamination activities. (C §3.7, #3.)

17. The County 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. (C §3.8, #1.)
18. 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. (C §3.9, #1.)
19. The County plan contemplates that radiation monitoring members will use their personal 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, #3.)
20. The 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.)
21. The Radiation Monitoring Team does not have the equipment that is needed to adequately detect radiation. (C §3.10, #6.)
22. 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, #2.)
23. The telephone system will not be adequate. There will not be enough lines in the event of an emergency. (C §4.2.1, #2.)
24. The County Sheriff's radio communications system is not adequate to cover all of Coffey County or to talk with the Wolf Creek Plant. (C §4.2.2, #1)
25. 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, #1.)

26. The State radiation monitoring equipment is not sufficient to deal with the type of emergency that can occur at Wolf Creek. (S Tab A, #2.)
27. The State Department of Transportation personnel are not equipped to perform responsibilities specified in the State Plan. (S Tab B, #3.)
28. The Kansas Highway Patrol personnel are not equipped to carry out all the responsibilities specified in the State Plan. (S Tab B, #4.)
29. The Kansas Chapter of the American Red Cross is not adequately equipped to provide the tasks specified in Section 3.2 of Tab C of the State plan. (S Tab C, #1.)
30. 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. (S Tab J, #1.)

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 underestimated. Specifically:

1. The evacuation confirmation process will take too long and thereby increase the potential number of radiological injuries. (C §1.2.3, #6.)
2. The County Engineer does not have enough personnel and equipment to clear evacuation routes in a reasonable amount of time. (C §1.2.5, #4.)

3. The County plan is not precise about which evacuation routes that people in various subzones will follow. (C §3.3, #1.)
4. 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 supposed to. This will substantially increase the evacuation time. (C §3.3, #2.)
5. The capacity of the evacuation routes is overstated. (C §3.3, #3.)
6. The County 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. (C §3.3, #6.)
7. The County 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. (C §3.3, #7.)
8. 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. (C §3.3, #10.)
9. The County 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. (C §3.3.1, #1.)
10. The County 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. (C §3.3.1, #5.)
11. The County plan is deficient because it does not make provision to train the bus drivers and to assure that they will respond. (C §3.3.1, #7.)
12. 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, #5.)

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. Specifically:

1. The County Clerk has not been adequately involved in the preparation of the emergency planning information to be distributed to the public. (C §1.2.4, #2.)
2. The County 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. (C §1.2.4, #3.)
3. 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 County plan needs to specify how many numbers and lines will be needed. These numbers should be listed for public use. (C §1.2.4, #4.)
4. The County 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. (C §1.4.3, #1.)
5. The County 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. (C §3.3.1, #4.)
6. The County plan is deficient because in Section 3.3.1 the Public Information Officer will advise the parents where the 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. (C §3.3.1, #6.)

7. The County 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. (C §3.7, #2.)
8. The County 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. (C §3.7, #5.)
9. The details about the evacuation routes and sectors will be too long and confusing. People will, therefore, not follow the instructions. (C Table 3.12, sheet 12, #1.)
10. The County 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. (C §5.3, #1.)
11. The public information and emergency planning education materials should be set forth in the County 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. (C §5.3, #2.)
12. 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. (C §5.3, #3.)

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 received the warning notice as required. Specifically:

1. The County plan does not consider what happens if communications between Coffey County and Wolf Creek and between Coffey County and the State. There is not adequate backup equipment. (C §1.2.2, #1)
2. 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 sheriff is responsible for. (C §1.2.2, #2)
3. The format and content of the notification message by KG&E has not been determined by the Sheriff, Emergency Preparedness Coordinator, and KG&E. (C §3.2, #1)
4. The County 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. (C §3.2, #3)
5. There is no indication that radio station WREN in Topeka has the details of the County plan and will know how to respond if it receives an emergency message from the public information officer. (C §3.2, #4)
6. Tone alert radios have not been available to county residents who will not be able to hear the sirens when they are evacuated. The County plan does not indicate how many of the tone alerts will be required. (C §3.2, #5)
7. The County plan is deficient because does not indicate who will decide which of the messages listed in Table 3-2 will be used. (C §3.2, #6)
8. The County 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. (C §3.2, #7)
9. The County 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. (C §3.2, #8)

10. The County plan does not provide how the U.S. Army Corps 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 provisions made for how the sheriff will notify those organizations when the warning function is activated. (C §3.2, #9)
11. The County 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. (C §3.4, #4)
12. The County plan is deficient because the County Health Nurse will not be able to adequately identify in advance persons who will require special emergency transportation. There is no provision made to update the list as changes occur. (C §3.5, #5)

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. Specifically:

1. The planning for the drills and exercises by Coffey County is not adequate. (C §5.2, #1)
2. The details of the drills should be specified in the County 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. (C §5.2, #2)
3. 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. (S Tab N, #1)

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 required equipment required to implement the plans. Specifically:

1. 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. (C §4.3.1, #3)

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. Specifically:

1. The shelter leader has not been trained. (C §1.1, #6)
2. The people needed to handle the confirmation activities have not been trained. (C §1.2.3, #6)
3. 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 implemented. (C §1.2.3, #8.)
4. The Emergency Preparedness Coordinator has not made arrangements to coordinate training drills and exercises with KG&E and the State agencies. (C §1.2.3, #9)
5. The County 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. (C §1.2.3, #11)
6. The County plan does not provide how fire personnel will be trained to handle decontamination. (C §1.2.6, #6.)
 7. The County Health Office has not trained volunteer teams to provide medical care and first aid. (C §1.2.7, #2)
 8. There are no personnel trained to assist the Shelter Leader in the management of shelters. (C §1.2.8, #2.)
 9. The Radiation Monitoring Team has not been trained. (C §1.2.10, #2)
 10. The County plan is deficient because it does not specify the type of training and a sufficient amount of training for radiological monitoring team members. (C §1.2.10, #3)
 11. None of the County Engineer's personnel are trained for rescue in the evacuation area. (C Table 1-1, #5)
 12. The teachers, school administrators, and children have not been trained about how to handle the evacuation, and there are no plans in the County plan to specify how they will be instructed to deal with an emergency evacuation. (C §3.3.1, #2)
 13. The plan is deficient because it does not make provision to train the bus drivers and to assure that they will respond. (C §3.3.1, #7)
 14. The County 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. (C §3.7, #7)
 15. The County plan does not specify how personnel assigned to handle the radiation monitoring check will be trained. (C §3.7, #8)
 16. The temporary managers of each shelter have not been trained. (C §3.8, #3)

17. The workers do not have any training program organized to teach them to use the dosimeters. (C §3.9, #2)
18. 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. (C §3.9, #4)
19. There are no details about training the Radiation Monitoring Team to use the monitoring equipment. (C §3.10, #6)
20. There is no adequate arrangement between Coffey County and the State to provide radiological emergency response training for State and local emergency organization personnel. (C §5.1, #1)
21. 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. (C §5.1, #2)
22. 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. (C §5.1, #3)
23. The County plan should specify in detail the type and amount of training that individuals will receive. (C §5.1, #4)
24. 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. (C §5.1, #5)
25. The training to be provided to the positions listed in Table 5-1 of the County plan should be specified in detail. Allowances must be made for the time and costs involved in providing such training. (C Table 5-1, #1)

26. 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. (S Tab A, #1)
27. 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. (S Tab A, #4)
28. The State Department of Transportation personnel are not trained to perform responsibilities specified in the State plan. (S Tab B, #3.)
29. The Kansas Highway Patrol personnel are not trained to carry out all the responsibilities specified in the State plan. (S Tab B, #4.)
30. 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. (S Tab O, #1)
31. 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. (S Tab O, #2)

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

1. The County 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 automobiles. (C §1.2.5, #11)
2. 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, #1)
3. The County 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. (C §1.2.10, #4)
4. The County plan is deficient because it places the County Clerk above the Emergency Preparedness Coordinator in the chain of command and line of succession (C §1.3, #1)
5. The County plan is deficient because Table 1-1 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. (C Table 1-1, #1)
6. Table 1-1 of the County plan 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. (C Table 1-1, #2)
7. The County 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". (C §3.2, #2)
8. The County 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. (C §3.4, #1)

9. The County 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. (C §3.4, #2)
10. The County 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. (C §3.4, #3)
11. 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. (C §3.10, #2)
12. 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. (S Tab G, #1)

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. Specifically:

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. (S Tab B, #1)

2. 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. (S Tab I, #1)
3. 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. (S Tab K, #1)