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June 13, 1983

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

Gentlemen:

In accordance with Applicants' May 19, 1983 letter to the Board, enclosed is a collation of Intervenor's interrogatory responses identified in paragraph 6(a)-(h) of "Intervenor's Response To Applicants' Objections" (May 12, 1983). As explained in our May 19 letter, the enclosed compilation represents Applicants' best efforts to collate the designated interrogatory responses in a coherent, non-repetitive format, reflecting the agreements of all parties on the scope of the issues for litigation.

Please note that the enclosed compilation includes Intervenor's statement of contentions on medical treatment for radiologically exposed and contaminated, injured individuals. The parties' positions

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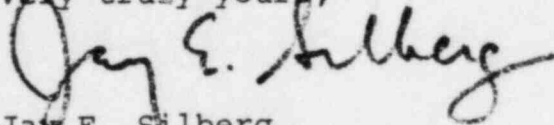
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June 13, 1983
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on the litigability of these issues remains as stated in the
May 19, 1983 letter. We await the ruling of the Board on
this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jay E. Silberg". The signature is fluid and cursive, with the first name "Jay" being more prominent.

Jay E. Silberg
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Counsel for Applicants

cc: Service List

UNITED STATES OF AMERICA -
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

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1. Initial Notification and Official Communications

- a. The format and content of the notification message by KG&E has not been determined by the Sheriff, Emergency Preparedness Coordinator, and KG&E. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 25; 5/12/83 Response, at 4]
- b. The County 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) [4/7/83 Answers, at 16]
- c. The County 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) [4/7/83 Answers, at 15]
- d. 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. The evacuation time will therefore be longer than estimated. (C, §§3.3.1, 3.2) [4/7/83 Answers, at 25,29; 5/12/83 Response, at 4]
- e. The County Plan does not make adequate provision for how the Sheriff will notify the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and the Kansas Fish and Game Commission when the warning function is activated. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]
- f. 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) [4/7/83 Answers, at 16]
- g. 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 communications is provided for. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]

- h. The County 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) [4/7/83 Answers, at 13]
- i. The County Plan does not specify who the Fire Leader is to notify if a fire chief is not available. (C, § 1.2.6) [4/7/83 Answers, at 19]
- j. It is not specified what the fire chiefs of the various cities are to do when they are notified by the Fire Leader. (C, § 1.2.6) [4/7/83 Answers, at 19]
- k. 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 responsible for. (C, § 1.2.2) [4/7/83 Answers, at 14]
- l. The County 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. (C, § 1.2.2) [4/7/83 Answers, at 14]

2. Coffey County Courthouse and EOC Communications

- a. Due to insufficient staffing, Coffey County cannot provide adequate dispatchers to handle communications. Although 9 personnel are needed to fill this function, only 5 dispatchers are presently available. [1/22/82 Answers, at 3,4]
- b. 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. [4/7/83 Answers, at 2,5]
- c. The telephone system will not be adequate. There will not be enough lines in the event of an emergency. (C, § 4.2.1) [4/7/83 Answers, at 41]

- d. There are not enough telephones at the County Emergency Operations Center to handle the calls that will come in during an emergency. [4/7/83 Answers, at 7]
- e. 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, §§ 1.2.5, 3.5) [4/7/83 Answers, at 19,32]

3. Sheriff's Communications Equipment

- a. The Sheriff needs radio equipment that will permit him to talk to Security at the Wolf Creek Plant. (C, §§ 1.2.2, 4.2.2) [4/7/83 Answers, at 7,15,41]

4. County EOC Power

- a. There is not an adequate source of emergency power at the Coffey County Emergency Operations Center. 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) [4/7/83 Answers, at 9,41]

5. Coffey County Courthouse and EOC Security

- a. Due to insufficient staffing, Coffey County cannot provide security for the Coffey County Courthouse in the event of an emergency. Although 6 persons are needed to fill this function, none are presently available. [1/22/82 Answers, at 3,4]
- b. 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) [4/7/83 Answers, at 14]

6. Emergency Response Command/Control

- a. The County Plan should provide more details about how the Emergency Operations Center will be activated. (C, § 1.2.3) [4/7/83 Answers, at 15]
- b. 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." The evacuation time will be longer than estimated, for this reason. (C, § 3.2) [4/7/83 Answers, at 25; 5/12/83 Response, at 4]
- c. 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) [4/7/83 Answers, at 24]
- d. 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. (K, Tab B) [4/7/83 Answers, at 44]
- e. 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 indicate the Governor will make the decision, and it conflicts with the Coffey County Plan. (K, Tab B) [4/7/83 Answers, at 45]
- f. 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) [4/7/83 Answers, at 23]
- g. Due to insufficient staffing, Coffey County cannot adequately direct the evacuation. Although 2 personnel are required to perform this function, only the Sheriff is presently available. [1/22/82 Answers, at 1,4]

- h. There are no details in the County Plan about what protective actions the Emergency Preparedness Coordinator will assist the Sheriff with. (C, § 1.2.3) [4/7/83 Answers, at 16]
- i. The County 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) [4/7/83 Answers, at 13]
- j. The County Plan does not establish guidelines and details about how and when a curfew will be imposed by the County Commissioners. (C, § 1.2.1) [4/7/83 Answers, at 13]
- k. 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) [4/7/83 Answers, at 13]
- l. 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) [4/7/83 Answers, at 24]
- m. The Fire Leader does not have the knowledge or the authority needed to shut off natural gas and electric service. (C, § 1.2.6) [4/7/83 Answers, at 20]
- n. The County Engineer has more responsibilities than he will be able to handle. (C, § 1.2.5) [4/7/83 Answers, at 18]
- o. The County 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) [4/7/83 Answers, at 19]
- p. The County Plan does not make provision for the absence of both the Sheriff and the Under Sheriff. (C, § 1.2.2) [4/7/83 Answers, at 15]
- q. The County 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) [4/7/83 Answers, at 16]

- r. The County 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) [4/7/83 Answers, at 17]
- s. There is no provision for the absence of the person designated or for relief of the person or persons responsible for controlling access to the County Courthouse and the County EOC during an emergency. (C, § 1.2.2) [4/7/83 Answers, at 14-15]

7. Protective Action Criteria

- a. NUREC-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 County Plan does not adequately consider how this kind of situation will be handled and the consequences of it. (C, Table 3-5) [4/7/83 Answers, at 40]
- b. The County Plan is deficient because it places too great a reliance on shelter when a greater effort should be made to provide for evacuation. (C, § 3.3) [4/7/83 Answers, at 28]
- c. 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) [4/7/83 Answers, at 24-25]
- d. The County 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 of 15) [4/7/83 Answers, at 38]

8. Evacuation Time Estimate

- a. The County 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. (C, § 3.3, Table 3-5) [4/7/83 Answers, at 28, 39]
- b. Evacuation times for an evacuation on a winter and under adverse weather conditions are virtually identical. This is not realistic and therefore the plans are deficient. (C, Table 3-5) [4/7/83 Answers, at 40]
- c. The County Plan does not provide an estimated evacuation time for individuals who do not have their own private automobiles for transportation. There is no estimate of evacuation time for them. (C, § 3.3) [4/7/83 Answers, at 28]

9. Evacuation Routes

- a. The County Plan is not precise about which evacuation routes that people in various subzones will follow. (C, § 3.3) [4/7/83 Answers, at 27]
- b. The capacity of the evacuation routes is overstated. (C, § 3.3) [4/7/83 Answers, at 27]
- c. The County Plan is deficient because the evacuation routes send the evacuees downwind 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) [4/7/83 Answers, at 29]
- d. 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) [4/7/83 Answers, at 28]
- e. The County Plan does not provide for alternate evacuation routes that will be necessary if there is heavy snow, rain, flooding, or fog. [5/12/83 Response, at 5]

10. Road Clearance

- a. The County Plan does not indicate in detail how the County Engineer will get information about road conditions. (C, § 1.2.5) [4/7/83 Answers, at 18]
- b. Due to insufficient staffing, Coffey County cannot clear and sand evacuation routes in the event of snow and adverse weather in a reasonable amount of time. 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. (C, § 1.2.5) [1/22/82 Answers, at 3,4; 4/7/83 Answers, at 4,18]
- c. Coffey County does not have enough snow plows, desalting trucks, and other snow removal equipment to clear the roads for an evacuation in a reasonable amount of time. (C, § 1.2.5) [4/7/83 Answers, at 7,18]
- d. The County Plan does not specify the priority for the cleaning of evacuation routes. (C, § 1.2.5) [4/7/83 Answers, at 18]

11. Public Alert and Notification System

- a. 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. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]
- b. The sirens that are installed for warning purposes will not cover the entire emergency planning zone under all circumstances. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]
- c. Coffey County does not have sufficient sirens needed to warn people in the event of an emergency. Twenty will be required. [1/22/82 Answers, at 9]

- d. The ability of the public to hear the warning sirens will be more adversely affected by weather conditions than the plan contemplates. [5/12/83 Response, at 5]
- e. There is no provision about how to make the warning if one or more sirens fail to operate. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]
- f. Due to insufficient staffing, Coffey County cannot make the initial notification of an emergency in the required time. Although 67 personnel are required to perform this function, only 10 Sheriff's Department personnel and 3 Burlington Police are presently available. [1/22/82 Answers, at 1,4]
- g. The Coffey County Sheriff's Department does not have sufficient equipment for warning people in the event of an emergency requiring an evacuation. In order to provide for proper notification and communication, the following are required: vehicles with loudspeakers - 57; and tone alerts for each home - 3500. [1/22/82 Answers, at 9]
- h. Tone alerts have not been made 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. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]
- i. The County Plan makes no recommendation about how an up to date listing of those needing tone alerts will be maintained. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]
- j. There is no provision for testing or maintenance of the tone alerts. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]
- k. 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 sirens or the tone alerts. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]

1. 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. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 27; 5/12/83 Response, at 4]

12. Public Emergency Planning Education and Information

- a. The County Clerk has not provided how he will meet the responsibilities set forth in Section 1.2.4 of the County Plan. (C, § 1.2.4) [4/7/83 Answers, at 17]
- b. The County Plan indicates that the Public Information Officer will engage in "several activities" to assure that emergency planning educational information is easily accessible to the general public. This is too vague and the activities should be specified in detail. (C, § 5.3) [4/7/83 Answers, at 43]
- c. The County Clerk has not been adequately involved in the preparation of the emergency planning educational information to be distributed to the public. (C, § 1.2.4) [4/7/83 Answers, at 17]
- d. The public information and emergency planning education materials should be set forth in the County Plan. (C, § 5.3) [4/7/83 Answers, at 43]
- e. There is no detail about how the education information will be provided to transients. (C, § 5.4) [4/7/83 Answers, at 43]
- f. The County Plan is deficient because it does not provide how the public will be kept advised of plan changes that will affect them at the time of an evacuation. [5/12/83 Response, at 5]
- g. The County Plan should provide methods by which it can be determined if the public is aware of the public information and emergency planning education materials and if they understand how they are to respond in the event of an emergency. (C, § 5.3) [4/7/83 Answers, at 43]
- h. 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) [4/7/83 Answers, at 31]

- i. 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) [4/7/83 Answers, at 31]
- j. 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) [4/7/83 Answers, at 17]
- k. 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 Commissioners. (C, § 3.4) [4/7/83 Answers, at 31]
- l. 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. (C, § 1.2.4) [4/7/83 Answers, at 17]
- m. 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. (K, Tab G) [4/7/83 Answers, at 46]
- n. 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) [4/7/83 Answers, at 31]
- o. 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. The evacuation time will therefore be longer than

estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]

- p. The County Plan is deficient because it does not indicate who will decide which of the messages listed in Table 3-2 will be used. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]
- q. The instructions of the message in Table 3-2, Sheet 11 of 15, are not consistent with the County 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. (C, Table 3-2, Sheet 11 of 15) [4/7/83 Answers, at 39]
- r. In the message at Table 3-2, Sheet of 12 of 15, the details about the evacuation routes and sectors will be too long and confusing. People will, therefore, not follow the instructions. (C, Table 3-2, Sheet 12 of 15) [4/7/83 Answers, at 39]
- s. The County 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. (C, § 3.3.1) [4/7/83 Answers, at 30]
- t. 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) [4/7/83 Answers, at 17]

13. Evacuation of Pregnant Women and Small Children

- a. There is no provision for the evacuation of pregnant women and small children even if shelter is considered for others. (C, § 3.3) [4/7/83 Answers, at 28]
- b. The County Plan does not provide for transportation for the evacuation of pregnant women and small children if they are evacuated before others. 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. (C, Table 3-2, Sheet 8 of 15) [4/7/83 Answers, at 9,38]

- c. Evacuation routes are not specified for pregnant women and small children evacuating before others. (C, Table 3-2, Sheet 8 of 15) [4/7/83 Answers, at 38]
- d. The County Plan is deficient because it does not indicate where pregnant women and preschool age children will go if they are evacuated before others. (C, Table 3-2, Sheet 8 of 15) [4/7/83 Answers, at 38]

14. Evacuation of Schools

- a. 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) [4/7/83 Answers, at 29]
- b. There are not enough school buses available to evacuate school children. (C, § 3.3.1) [4/7/83 Answers, at 8,29]
- c. The County Plan does not make provision for buses not being available at the time of evacuation. (C, § 3.3.1) [4/7/83 Answers, at 29]
- d. 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) [4/7/83 Answers, at 29]

15. Evacuation of Health Care Facilities and Residents Needing Special Transportation Assistance

- a. The County 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) [4/7/83 Answers, at 20]

- b. The details of how the Health and Medical Management Team will provide transportation and alternate facilities for patients at hospitals and nursing homes are not specified. (C, § 3.3.2) [4/7/83 Answers, at 30]
- c. The County Engineer and the Coffey County Ambulance Service do not have sufficient transportation (ambulances, buses, etc.) to evacuate people from nursing homes and the Coffey County Hospital. (C, §§ 1.2.7, 3.3.2) [4/7/83 Answers, at 8,20,30]
- d. If the communications frequency is changed, the Coffey County Ambulance Service needs radio equipment to communicate with the Sheriff's Office and others. This will require equipment for 2 vehicles. [1/22/82 Answers, at 9]
- e. The County Engineer will not be able to provide transportation to evacuate people from nursing homes and the Coffey County Hospital because of other duties that he has in the time of an emergency. (C, § 1.2.7) [4/7/83 Answers, at 20]
- f. Coffey County will need litters to evacuate nursing home patients. Ten litters will be needed for the Sunset Manor Nursing Home, and twenty litters would be needed for the Golden Age Lodge Nursing Home in Burlington. Two litter buses will be required to provide for the evacuation of nursing homes. [1/22/82 Answers, at 10]
- g. Due to insufficient staffing, Coffey County cannot assist with evacuation of nursing homes. Although 15 personnel would be required to fill this function, none are presently available. [1/22/82 Answers, at 3,4]
- h. Due to insufficient staffing, Coffey County cannot provide ambulances for emergency patients and at the same time provide for evacuation of hospital patients. Although 6 personnel would be required to fill this function, none are presently available. [1/22/82 Answers, at 2,4]
- i. Due to insufficient staffing, Coffey County Hospital cannot provide for the special treatment of emergency patients and at the same time assist with evacuation of its regular patients. Although 6 personnel would be required to fill this function, none are presently available. [1/22/82 Answers, at 2,4]

- j. 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) [4/7/83 Answers, at 30]
- k. The County 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. (C, § 3.3.2) [4/7/83 Answers, at 31]
- l. The County Plan is deficient because the Health and Medical 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) [4/7/83 Answers, at 30]
- m. The County 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. (C, § 3.5) [4/7/83 Answers, at 32]
- n. The County Health Nurse has not compiled a list of county residents who are shut-ins or who may need special evacuation assistance. (C, § 1.2.7) [4/7/83 Answers, at 21]
- o. The County Plan does not make adequate provision for preparing a list of county residents who are shut in or who may need special evacuation assistance, and does not make adequate provision for updating the list as changes occur. (C, § 1.2.7, 3.5) [4/7/83 Answers, at 21,32]

16. Evacuation of Persons Without Private Transportation

- a. The County 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) [4/7/83 Answers, at 18]

- b. Coffey County will not be able to identify in advance the people who will need emergency transportation, because it is not adequately staffed. [4/7/83 Answers, at 2]
- c. 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. [4/7/83 Answers, at 5]
- d. There are no people available to coordinate the evacuation of individuals without transportation. Ten or more people would be required for this function. [4/7/83 Answers, at 5]
- e. 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) [4/7/83 Answers, at 32]
- f. The County Plan is deficient because it does not estimate how many people will be required to provide transportation for those who do not have their own means of transportation. (C, § 3.5) [4/7/83 Answers, at 32]
- g. There are not enough personnel available to provide transportation for those who do not have their own means of transportation. (C, § 3.5) [4/7/83 Answers, at 32]
- h. Due to insufficient staffing, Coffey County cannot adequately aid in providing transportation for evacuation for those who do not have their own means of transportation. At a minimum, 100 people will be required to perform this function. At least 10% of the people to be evacuated will be without transportation. None of the people required to perform this function are available. [1/22/82 Answers, at 2,4; 4/7/83 Answers, at 3]
- i. 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. (C, § 1.2.5) [4/7/83 Answers, at 19]
- j. The fire personnel will have other duties that will prevent them from assisting with transportation of those who lack private transportation. (C, § 1.2.5) [4/7/83 Answers, at 19]

- k. The County Plan is deficient because it does not estimate how many buses will be required to provide transportation for those who do not have their own means of transportation. (C, § 3.5) [4/7/83 Answers, at 32]
- l. There are not enough vehicles available to provide transportation for those who do not have their own means of transportation. (C, § 3.5) [4/7/83 Answers, at 8,32]
- m. The Engineer has not made arrangements to obtain school buses. (C, § 1.2.5) [4/7/83 Answers, at 19]
- n. 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, §§ 1.2.5, 3.5) [4/7/83 Answers, at 19,32]

17. John Redmond Reservoir

- a. 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, 5.3) [4/7/83 Answers, at 24,43]
- b. 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) [4/7/83 Answers, at 24]
- c. 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) [4/7/83 Answers, at 24]
- d. 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. The evacuation time will therefore be longer than estimated. (C, § 3.2) [4/7/83 Answers, at 26; 5/12/83 Response, at 4]

- e. 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. [4/7/83 Answers, at 3]
- f. 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. Intervenor do not know how many of these people are available. [4/7/83 Answers, at 5]

18. Traffic Control, Access Control and EPZ Security

- a. The County Plan does not provide for enough traffic control. There is too little traffic control provision within the ten mile EPZ. (C, § 1.2.2) [4/7/83 Answers, at 14]
- b. The County Plan does not indicate what types of special activities will be handled at "priority" road blocks. (C, § 1.2.2) [4/7/83 Answers, at 14]
- c. The County 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) [4/7/83 Answers, at 25]
- d. The County Plan does not indicate how a status log for each roadblock will be maintained. (C, § 1.2.5) [4/7/83 Answers, at 18]
- e. Due to insufficient staffing, Coffey County cannot provide adequate traffic control and roadblocks. Approximately 222 to 227 personnel will be required to perform these functions. [1/22/82 Answers, at 2, 4; 4/7/83 Answers, at 3]
- f. The personnel to handle traffic control within the ten mile EPZ have not been selected. (C, § 1.2.2) [4/7/83 Answers, at 14]

- g. The Sheriff does not have enough personnel on his staff to provide traffic control within the ten mile EPZ. (C, § 1.2.2) [4/7/83 Answers, at 14]
- h. There will not be enough personnel from other law enforcement agencies to adequately control evacuation routes. (C, Table 1-1) [4/7/83 Answers, at 25]
- i. The County Engineer does not have enough personnel to handle the roadblocks required under the provisions of the County Plan. (C, § 1.2.5) [4/7/83 Answers, at 18]
- j. The County Plan does not indicate how many people will be required to handle special activities at "priority" roadblocks. The Sheriff does not have enough people for these duties. (C, § 1.2.2) [4/7/83 Answers, at 27]
- k. 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) [4/7/83 Answers, at 27]
- l. The County Plan does not specify the type of equipment that will be needed at the roadblocks and at traffic control locations. (C, § 1.2.2) [4/7/83 Answers, at 14]
- m. The County Engineer does not have enough vehicles, equipment, and barricades to handle the roadblocks required under the provisions of the County Plan. (C, § 1.2.5) [4/7/83 Answers, at 18]
- n. Coffey County does not have enough communications equipment for each of the roadblocks. There are about 65 roadblocks. [4/7/83 Answers, at 8]
- o. The County Plan is deficient because it does not clearly define what "access control" is and what the overall responsibilities of the access control personnel are. (C, § 3.6) [4/7/83 Answers, at 33]
- p. The County Plan should specify how many people will be required and the equipment that will be required to maintain access control. (C, § 3.6) [4/7/83 Answers, at 33]
- q. The County 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) [4/7/83 Answers, at 33]

- r. 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) [4/7/83 Answers, at 33]
- s. The Sheriff does not have the personnel available to handle access control to the area evacuated. (C, § 3.6) [4/7/83 Answers, at 32]
- t. The County Engineer does not have sufficient personnel to supplement or relieve the Sheriff's Office personnel in maintaining access control. (C, § 3.6) [4/7/83 Answers, at 33]
- u. 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) [4/7/83 Answers, at 33]
- v. The Sheriff does not have the equipment available to handle access control to the area evacuated. (C, § 3.6) [4/7/83 Answers, at 32]
- w. 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) [4/7/83 Answers, at 18]
- x. The Coffey County Road Department will need 66 barriers to control entry to the ten mile EPZ. It has approximately twenty; therefore, forty-six are still required. [1/22/82 Answers, at 9]
- y. The County Plan must specify who will be responsible for providing security for the evacuated area on a 24 hour per day basis and the details of what will be done. (C, § 1.2.2) [4/7/83 Answers, at 15]
- z. Due to insufficient staffing, Coffey County cannot provide security for the evacuated area. Although 45 personnel are required to perform this function, only 10 Sheriff's Department personnel and 4 Burlington police are presently available. The area to be secured after the evacuation may be all of Coffey County.^{1/} Therefore, at least the number of people

^{1/} The issue for litigation excludes the ability to implement protective actions for people living outside the plume exposure pathway emergency planning zone, but includes the effect of an

(Continued Next Page)

listed for security will be required. [1/22/82
Answers, at 3,4; 4/7/83 Answers, at 3]

- aa. The Sheriff does not have enough personnel to secure the evacuated area on a 24 hour per day basis. (C, § 1.2.2) [4/7/83 Answers, at 15]

19. Radiation Monitoring and Decontamination

- a. 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. (K, Tab I) [4/7/83 Answers, at 46]
- b. 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, 3.10) [4/7/83 Answers, at 22,37]
- c. The County Plan is deficient because it requires the Radiation Monitoring Team to do offsite monitoring and sample collection at the same time that it would be monitoring evacuees for radiation at the evacuation centers and doing decontamination activities. (C, §§1.2.10, 3.10) [4/7/83 Answers, at 22,37]
- d. The detail of the duties of the Radiological Defense Officer during an accident are not sufficiently specified. (C, §1.2.10) [4/7/83 Answers, at 22]
- e. 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) [4/7/83 Answers, at 22]

(Continued)

order to evacuate the entire County on the evacuation of the plume EPZ.

- f. The County Plan does not contemplate what to do if members of the Radiation Monitoring Team are not available. (C, §3.10) [4/7/83 Answers, at 38]
- g. 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) [4/7/83 Answers, at 38]
- h. The County Radiation Monitoring Team has not been selected. (C, §§1.1, 1.2.10) [1/22/82 Answers, at 6; 4/7/83 Answers, at 12,22]
- i. The County Plan is deficient because it does not state how many members of the Radiological Monitoring Team will be required, and does not contemplate enough people to handle the duties of the Radiological Monitoring Team. (C, §§1.1, 1.2.10) [4/7/83 Answers, at 12,23]
- j. Due to insufficient staffing, Coffey County cannot provide radiological monitoring. Although 45 persons are needed to fill this function, only 1 Radiological Monitor is presently available. [1/22/82 Answers, at 2,4]
- k. Coffey County will not be able to perform decontamination and radiation checks within the County and at evacuation centers, because it is not adequately staffed. There is no provision in the County Plan for an adequate number of personnel to implement the County Radiation Monitoring Team in order to check evacuees and vehicles at shelters for contamination. 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. The plan does not specify how they will be recruited. 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. (C, §3.7) [4/7/83 Answers, at 2,4-5,34]
- l. The Fire Leader does not have enough personnel to conduct the decontamination activities. (C, §3.7) [4/7/83 Answers, at 34]
- m. Fire Department personnel may be needed elsewhere at the same time they are needed for decontamination purposes. (C, §1.2.6) [4/7/83 Answers, at 19]

- n. The County Plan does not provide the details about how the fire personnel will handle decontamination. (C, §1.2.6) [4/7/83 Answers, at 20]
- o. Due to insufficient staffing, Coffey County cannot provide for decontamination at roadblocks. Although 16 personnel are needed to fill this function, only 8 Burlington Fire Department personnel are presently available. [1/22/82 Answers, at 2,4]
- p. The County 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) [4/7/83 Answers, at 34]
- q. The State radiation monitoring equipment is not sufficient to deal with the type of emergency that can occur at Wolf Creek. (K, Tab A) [4/7/83 Answers, at 9,44]
- r. The Coffey County Radiation Monitoring Team does not have proper radiation monitoring equipment to monitor radiation in the event of an evacuation. (C, §§ 1.2.10, 3.0) [1/22/82 Answers, at 10; 4/7/83 Answers, at 22,38]
- s. 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. [4/7/83 Answers, at 8,9]
- t. 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) [4/7/83 Answers, at 41]
- u. There is no provision in the County Plan for how the monitoring kits and the equipment in them will be distributed. (C, § 4.3.1) [4/7/83 Answers, at 41]
- v. The fire departments of the City of Burlington and other cities in Coffey County do not have sufficient radiation monitoring equipment that will detect radiation. [1/22/82 Answers, at 8-9]
- w. The Coffey County Sheriff's Department needs radiation monitoring equipment. [1/22/82 Answers, at 9]

- x. There is no adequate provision for insuring that the County 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) [4/7/83 Answers, at 41]
- y. The Radiation Monitoring Teams do not have enough vehicles for transportation to various sites in the County. The County Plan contemplates that Radiation Monitoring Team 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. (C, § 3.10) [4/7/83 Answers, at 9,37]
- z. The Coffey County Radiation Monitoring Team should be equipped with portable communications equipment for contacting others involved in an emergency or an evacuation process. Communications equipment for 18 people is required. [1/22/82, at 10]
- aa. 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. The Coffey 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) [4/7/83 Answers, at 9,38]
- bb. The County 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. (C, § 1.2.10) [4/7/83 Answers, at 23]
- cc. 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) [4/7/83 Answers, at 19]
- dd. There are not enough vehicles and decontamination equipment available to meet the decontamination responsibilities at roadblocks, access points, and evacuation centers. (C, § 3.7) [4/7/83 Answers, at 8,34]
- ee. The fire departments of Burlington and other cities in Coffey County do not have five tank trucks for use

at decontamination stations. [1/22/82 Answers, at 8-9]

- ff. There are not enough fire department vehicles available to meet the decontamination of vehicles responsibility. (C, § 1.2.6) [4/7/83 Answers, at 19]
- gg. The fire department equipment may be needed elsewhere at the same time it is needed for decontamination purposes. (C, § 1.2.6) [4/7/83 Answers, at 19]
- hh. The State Plan does not assume all evacuees will be checked for contamination. The Coffey County Plan does so. 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. It must be clear in the plans that all evacuees will be checked for contamination. (C, § 3.7; K, Tab K) [4/7/83 Answers, at 33,47]
- ii. The County 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) [4/7/83 Answers, at 35]
- jj. 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) [4/7/83 Answers, at 34]
- kk. The County 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) [4/7/83 Answers, at 35]
- ll. 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. (C, § 3.7) [4/7/83 Answers, at 34]

- mm. The County Plan does not indicate what "offsite survey information" is; and, therefore, the Emergency Preparedness Coordinator does not know what is to be maintained. (C, § 1.2.3) [4/7/83 Answers, at 15]

20. Shelter Facilities and Services

- a. The Shelter Leader has not been selected. (C, § 1.1) [4/7/83 Answers, at 12]
- b. The temporary managers of each shelter have not been selected. (C, § 3.8) [4/7/83 Answers, at 35]
- c. The Shelter Managers at the evacuation centers have not been designated and selected. (C, §§ 1.1, 1.2.8) [4/7/83 Answers, at 12,21]
- d. There are no people available to provide management at the evacuation centers. Up to 9,000 people would be evacuated.^{2/} One person for each 50 people evacuated will be needed. Therefore, 180 people are required. [4/7/83 Answers, at 1,4]
- e. 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) [4/7/83 Answers, at 35]
- f. 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. (C, § 1.2.8) [4/7/83 Answers, at 21]
- g. 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. (K, Tab C) [4/7/83 Answers, at 45]

^{2/} The issue for litigation excludes the ability to implement protective actions for people living outside the plume exposure pathway emergency planning zone, but includes the effect of an order to evacuate the entire County on the evacuation of the plume EPZ.

- h. The Kansas Department of Social and Rehabilitation Services does not have sufficient staff or equipment 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. [4/7/83 Answers, at 2,9]
- i. 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.^{3/} Not enough shelter sites have been specified. (C, §§ 1.2.3, 1.2.8, 3.8) [4/7/83 Answers, at 15,21,35]
- j. There is no provision for the type of services that will be provided at a shelter. (C, § 1.2.8) [4/7/83 Answers, at 21]
- k. There are not enough shelter facilities for 9,000 evacuees at the shelter center.^{4/} This will require sleeping, food preparation, medical, sanitation, and other facilities if the shelter needs are to be met. The County 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, §§ 1.1, 3.8) [4/7/83 Answers, at 7,12,35]
- l. The County Plan does not adequately contemplate a lengthy shelter. (C, § 3.8) [4/7/83 Answers, at 36]
- m. There has been no provision made about paying shelter owners for the use of their site or services. (C, § 3.8) [4/7/83 Answers, at 36]
- n. The County Plan is not specific about where people will go when they reach the city designated as an evacuation shelter site. (C, § 3.8) [4/7/83 Answers, at 35]

^{3/} The issue for litigation excludes the ability to implement protective actions for people living outside the plume exposure pathway emergency planning zone, but includes the effect of an order to evacuate the entire County on the evacuation of the plume EPZ.

^{4/} The issue for litigation excludes the ability to implement protective actions for people living outside the plume exposure pathway emergency planning zone, but includes the effect of an order to evacuate the entire County on the evacuation of the plume EPZ.

- o. The County Plan is deficient because the shelters may be downwind from the Wolf Creek Plant site and this could cause additional radiation injuries. (C, § 3.8) [4/7/83 Answers, at 36]

21. Medical Services and First Aid

- a. No person is designated as the leader of the County Health and Medical Management Team. (C, § 1.1) [4/7/83 Answers, at 12]
- b. The County Health Officer has not organized volunteer teams to provide medical care and first aid. (C, § 1.2.7) [4/7/83 Answers, at 20]
- c. The Kansas Department of Health is not prepared to provide the primary responsibility for adequate medical emergency services as specified in Figure B-2. (K, Tab B) [4/7/83 Answers, at 45]
- d. The Kansas Department of Health and Environment is not equipped to provide emergency medical services. [4/7/83 Answers, at 9]

22. Medical Treatment of Contaminated, Injured and Radiation Exposed Members of the Public

- a. The State and Coffey County have not adequately identified local or regional medical facilities which have the capabilities to provide appropriate medical treatment for persons with dangerous radiation exposure or who are contaminated, injured individuals, and they have not made a determination to what extent those facilities can provide such treatment. The plan should set forth the number and location of medical personnel trained in radiation treatment and should specify the arrangements that have been made with medical facilities about the treatment they will provide. [5/12/83 Response, at 5]
- b. Coffey County has not arranged for transporting radiologically exposed, radiologically contaminated, or radiologically injured persons to medical support facilities. [5/12/83 Response, at 5]

23. Rescue Services

- a. The County 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) [4/7/83 Answers, at 25]
- b. Coffey County will not be able to perform rescue duties in the evacuated area, because it is not adequately staffed. There are no people available for rescue duties. A team of 20 people or more should be available for such services. [4/7/83 Answers, at 2,5]

24. Confirmation of Evacuation

- a. The County 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) [4/7/83 Answers, at 16]
- b. The people needed to handle the confirmation activities have not been selected. County law enforcement and Fire Department personnel are not adequate to handle the activity. (C, § 1.2.3) [4/7/83 Answers, at 16]
- c. The County Plan does not adequately specify who or how many people will be involved in conducting a house to house search of the evacuated area. (C, § 3.3) [4/7/83 Answers, at 28]
- d. There are no people available to provide evacuation confirmation. The County Plan (Table 3-6) shows 62 are required [for the entire County].^{5/} The evacuation confirmation time parameters indicate that the

^{5/} The issue for litigation excludes the ability to implement protective actions for people living outside the plume exposure pathway emergency planning zone, but includes the effect of an order to evacuate the entire County on the evacuation of the plume EPZ.

confirmation will not be completed for up to 10.5 hours. This means that some individuals will not be out before then. The time must be reduced. Therefore, twice as many people are probably required. (C, §§ 1.2.3, 3.3, Table 3-6) [4/7/83 Answers, at 2,4,28,40]

25. County EOC Evacuation

- a. The County 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) [4/7/83 Answers, at 40]
- b. The County 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) [4/7/83 Answers, at 23]

26. Public Response

- a. The public will not respond as anticipated. They may use non-designated evacuation routes. They may not evacuate when directed. They may pick up children at school or other persons at other locations. They may evacuate earlier than desired. They may not report to shelter centers after leaving Coffey County. [5/12/83 Response, at 5]

27. Emergency Worker Response

- a. Many emergency workers will not respond as they would in a non-nuclear emergency. They will not do so because of a fear of radiation exposure and injury or in order to help friends and family evacuate. They will not report or will stop work after reporting. [5/12/83 Response, at 4]

- b. The County Plan is deficient because emergency workers will be likely not to respond when they are advised about the effects of large doses of radiation. (C, § 3.9) [4/7/83 Answers, at 36]

28. Dose Control for Emergency Workers

- a. The County Plan does not specifically detail how many dosimeters will be needed and what kind will be used. (C, §§1.2.10, 3.9) [4/7/83 Answers, at 23,37].
- b. There are not enough dosimeters for emergency personnel. [4/7/83 Answers, at 8]
- c. Even though the 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 County Plan does not contemplate enough of them to be available for each of the workers. (C, §3.9) [4/7/83 Answers, at 36]
- d. There is no plan specified for issuing dosimeters to County emergency workers. (C, §§1.2.10, 3.9) [4/7/83 Answers, at 22,37]
- e. The Radiological Defense Officer has not developed a system for controlling radiological exposure of emergency workers. (C, §1.2.10) [4/7/83 Answers, at 23]
- f. The County 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) [4/7/83 Answers, at 36]

29. Training

- a. 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) [4/7/83 Answers, at 42]

- b. Due to insufficient staffing, Coffey County cannot provide training for personnel in evacuation procedures and other procedures required for personnel to implement an evacuation plan. Although 2 persons are needed to adequately perform the training function, only 1 (the Emergency Planning Coordinator) is presently available. [1/22/82 Answers, at 1,4]
- c. The Coffey County Emergency Preparedness Coordinator has not developed the training programs needed to implement the County Plan, to familiarize Coffey County personnel with the plan and their responsibilities. (C, §§1.2.3, 5.1) [4/7/83 Answers, at 42,16; 5/12/83 Response, at 4]
- d. The County Plan does not contemplate training as many individuals as will actually be needed if the plan is to be implemented. (C, §1.2.3) [4/7/83 Answers, at 16]
- e. There is no provision in the County Plan to indicate who will actually do the teaching. (C, §1.2.3) [4/7/83 Answers, at 17]
- f. 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. There must be some assurance in the County training program that the Emergency Preparedness Coordinator knows that the individuals understand their responsibilities and that they are adequately trained. (C, §§1.1, 5.1) [4/7/83 Answers, at 12,42]
- g. The County Plan should specify in detail the type and amount of training that individuals will receive. The training to be provided to the positions listed in Table 5-1 should be specified in detail. (C, §5.1, Table 5.1) [4/7/83 Answers, at 42,43]
- h. The following local personnel lack sufficient training to perform their assigned functions and should be trained in the identified areas:
 - (1) The Coffey County Emergency Preparedness Coordinator. Advice to Sheriff about protective action to take; locating, storing, and distribution of emergency equipment; training personnel about evacuation duties and emergency equipment; have knowledge about radiation monitoring, decontamination processes, and use of protective gear; understanding duties of each person

- involved in the plan; conducting evacuation drills; training public about how to respond to an emergency; evacuation of people who lack transportation; implementing 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) [1/22/82 Answers, at 4,5; 4/7/83 Answers, at 36]
- (2) Coffey County Commissioners. [4/7/83 Answers, at 6]
 - (3) Coffey County Clerk. [4/7/83 Answers, at 6]
 - (4) Coffey County Sheriff. Coordination of evacuation process; knowledge of plan to advise people about duties and how to implement their duties, training of personnel to conduct evacuations; conduct of evacuation plan drills; notification of radiological emergency; management of roadblocks and traffic control; security of evacuated area; evacuation of persons without transportation. [1/22/82 Answers, at 4,5]
 - (5) Coffey County Sheriff's Department personnel. [4/7/83 Answers, at 6]
 - (6) Coffey County Engineer. Cleaning and maintaining of roads in bad weather; operation of roadblocks and traffic control. [1/22/82 Answers, at 4,6]
 - (7) Coffey County Engineer's staff. Rescue functions. (C, Table 1-1) [4/7/83 Answers, at 25]
 - (8) Personnel of the Coffey County Road Department. Management and assistance at roadblocks. [1/22/82 Answers, at 5,7]
 - (9) The Burlington City Police Department and other police departments within Coffey County. Giving of initial warnings; security of area after evacuation; traffic control, and management of roadblocks. [1/22/82 Answers, at 5,7]
 - (10) Personnel of the City of Burlington Fire Department and the personnel of other fire departments within Coffey County. Decontamination process at roadblocks and checkpoints; use of protective gear during the evacuation process. (C, §1.2.6) [1/22/82 Answers, at 4,6; 4/7/83 Answers, at 20]

- (11) Traffic control personnel. (C, §1.2.2) [4/7/83 Answers, at 14]
- (12) Coffey County Health Officer. [4/7/83 Answers, at 6]
- (13) Volunteer teams to provide medical care and first aid (to be trained by the County Health Officer). (C, §1.2.7) [4/7/83 Answers, at 20]
- (14) Coffey County Health Nurse. [4/7/83 Answers, at 6]
- (15) Nursing home administrators and staff. [4/7/83 Answers, at 6]
- (16) Coffey County Hospital Staff. Evacuation of patients at hospital. [1/22/82 Answers, at 4,6; 4/7/83 Answers, at 6]
- (17) Coffey County Ambulance Service. Evacuation of patients at hospital and coordination of that duty with treatment of individuals injured in an emergency. [1/22/82 Answers, at 4,6]
- (18) Radiological Defense Officer. (C, § 1.2.10) [4/7/83 Answers, at 6,21]
- (19) Coffey County Radiological Monitoring Team. Taking an evaluation of radiation levels; operation of radiological monitoring equipment; knowledge about allowable radiation dosages; use of protective gear. (C, §§1.2.10, 3.0) [1/22/82 Answers, at 4,6; 4/7/83 Answers, at 22,38]
- (20) Personnel assisting the Radiation Monitoring Team with radiation monitoring checks. (C, §3.7) [4/7/83 Answers, at 34]
- (21) Shelter Leader. (C, §1.1) [4/7/83 Answers, at 6,12]
- (22) Temporary Shelter Managers. (C, §3.8) [4/7/83 Answers, at 6,35]
- (23) Shelter Managers. (C, §1.2.8) [4/7/83 Answers, at 6/21]
- (24) Bus drivers. To assure that they will respond. [4/7/83 Answers, at 30]

- (25) Personnel to perform confirmation of evacuation.
(C, §1.2.3) [4/7/83 Answers, at 16]
- (26) Volunteers and other personnel yet to be recruited who will have responsibilities under the plan. [4/7/83 Answers, at 6]
- i. The County Plan is deficient because the training of emergency workers about the effects of large doses of radiation is not specified in the plan. (C, §3.9) [4/7/83 Answers, at 36]
- j. The Coffey County emergency workers do not have any training program organized to teach them how to use the dosimeters. (C, § 3.9) [4/7/83 Answers, at 36]
- k. 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 turnover that must be dealt with. (C, §§1.2.3, 5.1) [4/7/83 Answers, at 17,42]
- l. The Coffey County Emergency Preparedness Coordinator is not prepared to conduct annual training sessions reviewing the elements of the County Plan and the responsibilities of each position. (C, §5.1) [4/7/83 Answers, at 42]
- m. Inadequate consideration has been given to the amount of time annual training will take and the imposition it places upon the emergency response personnel. (C, §5.1) [4/7/83 Answers, at 42,43]
- n. 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. (K, Tab A) [4/7/83 Answers, at 44]
- o. 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. (K, Tab A) [4/7/83 Answers, at 44]
- p. The State of Kansas Department of Emergency Preparedness is not adequately staffed to provide the necessary training for personnel involved with the

emergency evacuation plan and it does not have sufficient personnel to conduct emergency preparedness drills. Although 3 persons are needed to adequately perform the training function, none is presently available. [1/22/82 Answers, at 2]

- q. The State does not have adequate plans to train State personnel having emergency responsibilities. 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. (K, Tab O) [4/7/83 Answers, at 47]
- r. 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 this training should be specified in the State Plan. (K, Tab O) [4/7/83 Answers, at 48]
- s. The following State personnel lack sufficient training to perform their assigned functions and should be trained in the identified areas:
 - (1) State Department of Emergency Preparedness personnel. Training of people involved in the plan and the conduct of emergency planning drills. [1/22/82 Answers, at 5,7]
 - (2) Kansas Department of Health and Environment personnel. Familiarity with State and Coffey County Plans, so can meet its primary and support responsibilities as specified in the State Plan. (K, Tab B) [4/7/83 Answers, at 45]
 - (3) Kansas Bureau of Radiation Control personnel. Determining existence of offsite contamination. (C, §3.7) [4/7/83 Answers, at 33]
 - (4) Kansas National Guard Unit in Burlington, Kansas. Management of roadblocks and traffic control; evacuation of nursing homes and others; use of protective gear. [1/22/82 Answers, at 4,6]
 - (5) Kansas Highway Patrol personnel. Responsibilities specified in the State Plan. (K, Tab B) [4/7/83 Answers, at 6,45]

- (6) Kansas Department of Transportation personnel. Responsibilities specified in the State Plan. (K, Tab B) [4/7/83 Answers, at 6,45]
- (7) Kansas Department of Social and Rehabilitation Services. [4/7/83 Answers, at 6]
- (8) Kansas Fish and Game Commission personnel. [4/7/83 Answers, at 6]
- t. 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. (K, Tab O) [4/7/83 Answers, at 48]
- u. The following federal personnel lack sufficient training to perform their assigned functions:
 - (1) U.S. Army Corps of Engineers personnel [4/7/83 Answers, at 6]
 - (2) U.S. Fish and Wildlife Service personnel [4/7/83 Answers, at 6]

30. Drills and Exercises

- a. The planning for the drills and exercises by Coffey County is not adequate. (C, § 5.2) [4/7/83 Answers, at 43]
- b. The planning for the drills and exercises by the State is not adequate. [5/12/83 Response, at 4]
- c. 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) [4/7/83 Answers, at 16]
- d. 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) [4/7/83 Answers, at 43]

31. Resource Availability and Allocation

- a. 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) [4/7/83 Answers, at 12]
- b. The County Plan is deficient because it does not adequately indicate the number of the various types of equipment (other than dosimetry) that will need to be issued to County emergency workers. (C, § 1.2.10) [4/7/83 Answers, at 23]
- c. The fire departments of Burlington and other cities in Coffey County do not have radio equipment which is needed to communicate with the Sheriff's Office. [1/22/82 Answers, at 9]
- d. The Coffey County Road Department needs radio equipment for its vehicles to communicate with the Sheriff and others in the event of an emergency. [1/22/82 Answers, at 9]
- e. The Coffey County Sheriff's Department needs sealed vehicles for patrol of contaminated areas. [1/22/82 Answers, at 9]
- f. Protection gear for protection against radiation is needed for all workers who are involved in the evacuation plan. Three hundred fifty people will be involved in three shifts. If so, 116 sets of protective gear are required. [1/22/82 Answers, at 10]
- g. The Coffey County Commissioners do not know what priorities to set in regard to resources not identified in the County 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) [4/7/83 Answers, at 13]
- h. 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 County Plan needs to set forth how he will accomplish this in relation to other people involved in the plan. (C, § 1.2.1) [4/7/83 Answers, at 13-14]

- i. 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) [4/7/83 Answers, at 23]
- j. The State Plan should detail how many people and how much equipment are needed to respond to the emergency at Wolf Creek. (K, Tab A) [4/7/83 Answers, at 44]
- k. 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. (K, Tab H) [4/7/83 Answers, at 46]
- l. None of the equipment described in Section 1.6, page H-5, of the State Plan is located in Coffey County; it will not be available to Coffey County emergency personnel in a short enough period of time. (K, Tab H) [4/7/83 Answers, at 46]
- m. There is no plan specified for issuing equipment to County emergency workers. (C, § 1.2.10) [4/7/83 Answers, at 22]
- n. The State Department of Transportation personnel are not equipped to perform responsibilities specified in the State Plan. (K, Tab B) [4/7/83 Answers, at 45]
- o. The Kansas Highway Patrol personnel are not equipped to carry out all the responsibilities specified in the State Plan. (K, Tab B) [4/7/83 Answers, at 45]
- p. The plan is deficient because it does not provide for the means to check and maintain equipment that will be used to implement the plan. [5/12/83 Response, at 5]
- q. The plan is deficient because it does not provide for backup equipment when radiation monitoring equipment, transportation equipment for evacuation of people, and communications and warning equipment is not available or is inoperable. [5/12/83 Response, at 6]
- r. The Kansas 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. [4/7/83 Answers, at 2,5-6]
- s. The Kansas Department of Transportation does not have enough staff to perform all of the functions

specified in Section 2.1.2.2, page B-17, of the State Plan. [4/7/83 Answers, at 2,5-6]

- t. 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. (K, Tab B) [4/7/83 Answers, at 2,5-6,45]
- u. The Kansas Department of Social and Rehabilitation Services does not have sufficient staff to perform all of the functions specified in the State Plan. [4/7/83 Answers, at 5-6]
- v. The plan is deficient because it does not provide for the replacement of emergency workers who are not available or who fail to appear for work. [5/12/83 Response, at 6]

32. Funding for Emergency Preparedness

- a. Coffey County needs \$4,153,000 in additional funds (for the first 5 years of plant operation) for successful implementation of the evacuation plan. These funds are needed for:

Firetrucks for use at roadblocks (5)	\$100,000
Loudspeakers for warning cars	11,400
Warning tone alerts for residences and businesses	105,000
Litter buses for nursing home evacuation	25,000
Litters	1,500
Monitors (radiological)	25,000
Road barriers for roadblocks	4,600
Protective gear	58,000
Communications equipment	50,000
Additional telephones and telephone communication equipment	15,000
Additional communications equipment for 60 roadblocks	60,000
Decontamination equipment (200 sets) for evacuation centers	200,000
Radiation monitoring equipment (100 sets) for decontamination centers	100,000
Additional snow removal equipment (10 trucks and blades)	200,000
Rental of emergency transportation vehicles (200 vehicles x \$50 each)	10,000

Rental of vehicles for the Radiation Monitoring Team (10 vehicles x \$50 each/day x 5 days)	2,500
Shelter for 9,000 people at evacuation centers (9,000 people x \$50 each/day x 5 days)	2,250,000
Emergency medical care and evacuation for 1,000 radiological injuries	500,000
Sirens	160,000
Annual maintenance of equipment (5 yr. x \$10,000/yr.)	50,000
Compensation - Emergency (300 workers x \$100 each/day x 5 days)	150,000
Training (5 yr.)	75,000

These costs must be covered. If not, the plan cannot be implemented. The Coffey County Commissioners have not provided for the cost and must make a commitment to do so. [1/22/82 Answers, at 10-11; 4/7/83 Answers, at 10-11; 5/12/83 Response, at 7]

- b. The Kansas Emergency Preparedness Office needs \$127,000 in additional funds (for the first 5 years of plant operation) for successful implementation of the evacuation plan. The funds are needed for:

Training - Initial	\$ 27,000
Annual (5 yr. x \$20,000)	100,000