

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board  
OFFICE OF SECRETARY  
BOARD & SERVICE  
BRANCH

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

Summary of Direct Testimony of Intervenors' Witnesses

1. In lieu of filing the direct testimony of the Intervenors' witnesses, the Intervenors submit this summary of the matters that those witnesses will be asked about when they are called for their direct testimony at the Operating License Hearings.

2. At the Prehearing Conference and in a subsequent telephone conference call, the Board stated that if the Intervenors could only insure the appearance of a witness by issuing a subpoena or if the Intervenors believed that a witness they called was or might be uncooperative, then the procedure outlined in paragraph 1 above would be an acceptable substitute for the filing of the witness' direct written testimony.

3. The Intervenors have asked the Board to issue a subpoena to Phil McCracken, the Franklin County Emergency Preparedness Coordinator, in order to compel his appearance at the hearings. Mr. McCracken has indicated that he will

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only testify if he is subpoenaed. Additionally, Mr. McCracken was not adequately cooperative when he was interviewed by the Intervenor's attorney.

4. The Intervenor's have asked the Board to issue a subpoena to Robert Sattler, a Lyon County Commissioner, in order to compel his appearance at the hearings. Even though contacted by the Intervenor's attorney on November 28, 1983, Mr. Sattler will not be able to make himself available for an interview by the Intervenor's attorney until January 5, 1984. On or about December 1, 1983, Mr. Sattler was advised by the Intervenor's attorney that an interview no earlier than December 15 would make it almost impossible to get his testimony prepared and approved by him in order to be filed within the time limits imposed by the Board. Even so, he said he was not available until after that date. Because Mr. Sattler has not been adequately cooperative with the intervenors and because of the nature of the questions that he will be asked as a witness, it is not possible to prepare Mr. Sattler's written testimony in advance and file it in accordance with the Prehearing Conference Order.

5. The matters that the Intervenor's will ask Phil McCracken about are as follows:

(a). What he knows about the intent of the agreement dated May 11, 1983, between Coffey County and Franklin County and to what extent Franklin County is obligated under the terms of that agreement to provide

assistance to Coffey County if there is an accident at Wolf Creek. The agreement is set forth at page D-9 of the Coffey County plan.

(b). Whether there is a signed agreement between Coffey County and Franklin County adopting the Franklin County Shelter Plan that is set forth at pages J-16 to J-22 of the Coffey County Plan; whether he expects that changes will be made in that shelter plan; what those changes might be; and when the Franklin County Shelter Plan will be adopted.

(c). The contacts and discussions he has had with the Franklin County Commissioners, other Franklin County people, and Coffey County officials about the proposed shelter plan.

(d). The process for registering evacuees in Franklin County; the number and identity of the people that are recruited to register evacuees; the training and training programs that the registration workers have had and will have; the number of workers that will be required for the registration process; and the cost of the registration process and who will pay for it.

(e). The radiation monitoring procedures for evacuees; the number of people that will be used and are now available to monitor the evacuees; the identity of the radiation monitoring workers; the training that the radiation monitors have had and will have; the training and background of the radiological defense officer; the identity

of the radiological defense officer; and the cost of the radiation monitoring program and who will pay for it.

(f). The procedures for decontaminating evacuees; the identity of the people that will be doing the decontamination duties; the training that the decontamination workers have had and will have; the extent to which the decontamination workers are now available; what the procedures will be for the disposal of contaminated clothing, vehicles, equipment used for decontamination, and water used for decontamination; and the cost of the decontamination process and who will pay for it.

(g). The training that the Franklin County workers have had and will have about the Coffey County emergency plan; and how will that training be done.

(h). The procedures and arrangements that have been made for lodging for the evacuees; what firm commitments are there with the places that will provide the lodging; where will the evacuees be lodged; what will the lodging cost; who will pay for the lodging; how many can be lodged at each site; the adequacy of the lodging sites; the assurances that the lodging sites will continue to be available; the identity of the people that will assist at the lodging sites; the training that the lodging workers have had and will have; and the number of lodging assistance workers that will be needed and are now available.

(i). The procedures and arrangements for feeding the evacuees; where will they be fed; who will provide the

food; agreements in writing for providing the food; the cost of feeding the evacuees; who will pay for the cost of feeding the evacuees; who will prepare the food; the number of people that will be required to feed the evacuees and the extent to which these people are now available; the training that the workers who will feed the evacuees have had and will have.

(j). The protective clothing that is available for workers who could be exposed to radiation; whether this clothing will be made available to them; and how much it will cost and who will pay for it.

(k). Plans to provide substitute workers for those who are not available when the plan is initiated or during the course of an emergency.

(l). Plans for replacing and training workers who move or otherwise are not available to serve as an emergency worker.

6. The matters that the Intervenor will ask Robert Sattler about are as follows:

(a). What he knows about the intent of the agreement dated July 11, 1983, between Coffey County and Lyon County and to what extent Lyon County is obligated under the terms of that agreement to provide assistance to Coffey County if there is an accident at Wolf Creek. The agreement is set forth at page D-5 of the Coffey County plan.

(b). Whether there is a signed agreement between Coffey County and Lyon County adopting the Lyon County Shelter Plan that is set forth at pages J-23 to J-29 of the Coffey County Plan; whether he expects that changes will be made in that shelter plan; what those changes might be; and when the Lyon County Shelter Plan will be adopted.

(c). The discussions he has had with the Lyon County Commissioners, other Lyon County people, and Coffey County officials about the proposed shelter plan.

(d). The process for registering evacuees in Lyon County; the number and identity of the people that are recruited to register evacuees; the training and training programs that the registration workers have had and will have; the number of workers that will be required for the registration process; and the cost of the registration process and who will pay for it.

(e). The radiation monitoring procedures for evacuees; the number of people that will be used and are now available to monitor the evacuees; the identity of the radiation monitoring workers; the training that the radiation monitors have had and will have; the training and background of the radiological defense officer; the identity of the radiological defense officer; and the cost of the radiation monitoring program and who will pay for it.

(f). The procedures for decontaminating evacuees; the identity of the people that will be doing the decontamination duties; the training that the

decontamination workers have had and will have; the extent to which the decontamination workers are now available; what the procedures will be for the disposal of contaminated clothing, vehicles, equipment used for decontamination, and water used for decontamination; and the cost of the decontamination process and who will pay for it.

(g). The training that the Lyon County workers have had and will have about the Coffey County emergency plan; and how will that training be done.

(h). The procedures and arrangements that have been made for lodging for the evacuees; what firm commitments are there with the places that will provide the lodging; where will the evacuees be sheltered; what will the lodging cost; who will pay for the lodging; how many can be lodged at each site; the adequacy of the lodging sites; the assurances that the lodging sites will continue to be available; the identity of the people that will assist at the lodging sites; the training that the lodging workers have had and will have; and the number of lodging assistance workers that will be needed and are now available.

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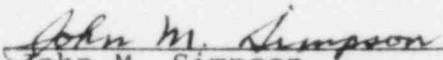
that the workers who will feed the evacuees have had and will have.

(j). The protective clothing that is available for workers who could be exposed to radiation; whether this clothing will be made available to them; and how much it will cost and who will pay for it.

(k). Plans to provide substitute workers for those who are not available when the plan is initiated or during the course of an emergency.

(l). Plans for replacing and training workers who move or otherwise are not available to serve as an emergency worker.

December 27, 1983.

  
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Before the Atomic Safety and Licensing Board

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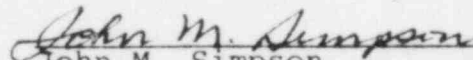
(Wolf Creek Generating Station,  
Unit No. 1)

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Docket No. STN 50-482

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Summary of Direct Testimony of Intervenors' Witnesses" was served by deposit in the United States Mail, first class, postage prepaid, this 27th day of December, 1983, to all those on the attached Service List.

  
John M. Simpson

DATED: December 27, 1983

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