

January 11, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '84 JAN 13 A11:10

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

KANSAS GAS AND ELECTRIC COMPANY, et al.)

(Wolf Creek Generating Station,
Unit No. 1))

Docket No. STN 50-482

APPLICANTS' INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO INTERVENORS
WANDA CHRISTY AND MARY ELLEN SALAVA (EPZ CONTENTION)

These Interrogatories and Request for Production of Documents are filed by the Kansas Gas and Electric Company, et al. ("Applicants"), pursuant to the Atomic Safety and Licensing Board's ("the Board") Order dated January 5, 1984 and the Nuclear Regulatory Commission's Rules of Practice. The interrogatories and document requests are directed to Intervenor Wanda Christy and Mary Ellen Salava and pertain to the plume exposure pathway emergency planning zone (EPZ) contention admitted in the Board's Order.

The Interrogatories submitted herein are filed pursuant to 10 C.F.R. § 2.740b which requires that the Interrogatories be answered separately and fully in writing under oath or affirmation, within 14 days after service. Pursuant to the Board's Order, answers must be submitted by January 30, 1984. The Interrogatories are intended to be continuing in nature,

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and the answers must be immediately supplemented or amended, as appropriate, should the Intervenors obtain any new or differing information responsive to the Interrogatories.

The Request for Production of Documents is filed pursuant to 10 C.F.R. § 2.741, which requires that the Intervenors produce and either furnish copies of or permit Applicants to inspect and copy any documents responsive to the request and which are in the possession, custody or control of the Intervenors. The Request for Production of Documents is also continuing in nature, and the Intervenors must produce immediately any additional documents they obtain which are responsive to the Request.

For purposes of these Interrogatories, the term "document(s)" means all writings and records of every type in the possession, control or custody of the Intervenors or of the Intervenors' attorney(s), including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings, and all other writings or recordings of any kind. "Document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of the Intervenors.

For purposes of these Interrogatories, a document shall be deemed to be within the "control" of the Intervenors or of the Intervenors' attorney(s) if they have ownership, possession or custody of the document or copy thereof, or have the right to

secure the document or copy thereof from any person or public or private entity having physical possession thereof.

When identification of a document is requested, briefly describe the document; i.e., letter, memorandum, book, pamphlet, etc., and state the following information as applicable to the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

INTERROGATORIES

1. (a) State the name, address, title, employer and educational and professional qualifications of each person you intend to call as a witness on the EPZ contention.

(b) State the subject matter on which each such person is expected to testify.

(c) State the substance of the facts and opinions to which each such person is expected to testify.

(d) State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

The purpose of this Interrogatory is to clarify the scope of the EPZ contention and to ascertain the factual bases which support each element of that contention so that the Applicants adequately can prepare their responses to the contention.

2. Identify all documents in your possession, custody or control, including all relevant page citations, pertaining to the subject matter of the EPZ contention. See purpose statement for Interrogatory No. 1.

3. Identify all documents, including all relevant page citations, which you intend to offer as exhibits during this proceeding to support the EPZ contention or which you intend to use during your cross-examination of witnesses presented by Applicants, NRC, or FEMA on the EPZ contention. See purpose statement for Interrogatory No. 1.

4. Explain precisely why the town of Waverly and the schools in Waverly should be included in the plume exposure pathway emergency planning zone. See purpose statement for Interrogatory No. 1.

5. (a) Identify the local emergency response needs and the local emergency response capabilities that relate to the exact size and configuration of the plume exposure pathway emergency planning zone at Waverly.

(b) Explain precisely why those local emergency response needs and why those local emergency response capabilities dictate the inclusion of the town of Waverly and the schools in Waverly in the plume exposure pathway emergency planning zone. See purpose statement for Interrogatory No. 1.

6. (a) State whether each of the following conditions affects local emergency response needs and capabilities at Waverly: (i) demography, (ii) topography, (iii) land characteristics, (iv) access routes, and (v) jurisdictional boundaries. Identify any other conditions that affect such needs and capabilities at Waverly.

(b) For each of the above conditions that you identify as affecting local emergency response needs and capabilities at Waverly, explain precisely (i) how each condition affects local emergency response needs and capabilities, (ii) whether the condition favors including Waverly and its schools in or excluding Waverly and its schools from the plume exposure pathway EPZ, and (iii) why that condition favors including Waverly in or excluding Waverly from the plume exposure pathway EPZ. See purpose statement for Interrogatory No. 1.

7. For each response to Interrogatory Nos. 4, 5(a), 5(b), 6(a), and 6(b):

(a) Identify all documents, including all relevant page citations, which you rely upon to support each of your claims;

(b) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual bases for each of your claims; and

(c) State the name of each person you intend to call as a witness to support each claim.

General Interrogatories Pertaining
to the EPZ Contention

8. State the name, title or position, address and employer of each person who provided information used in preparing responses to any of the foregoing interrogatories. The purpose of this Interrogatory is to identify potential witnesses.

9. For each person identified in response to the preceding Interrogatory, state the numbers of the Interrogatories for which information was supplied. See purpose statement for Interrogatory No. 8.

10. State the name, title or position, address and employer of each person who searched for documents in order to respond to any of the foregoing requests for identification of the documents. See purpose statement for Interrogatory No. 8.

11. For each person identified in response to the preceding Interrogatory, state the numbers of the Interrogatories for which the search was conducted and the location where the search was conducted. See purpose statement for Interrogatory No. 8.

12. Identify any written or recorded statement of any individual pertaining to the subject matter of the EPZ contention not previously identified in response to the foregoing interrogatories. See purpose statement for Interrogatory No. 8.

REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenor respond in writing to the following request for production of documents and produce the original or best copy of each of the documents requested below, at a place mutually convenient to the parties.

The term "document(s)" means all writings and records of every type in the possession, control or custody of the Intervenor or of the Intervenor's attorney(s), including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice records, and all other writings or recordings of any kind. "Document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of the Intervenor.

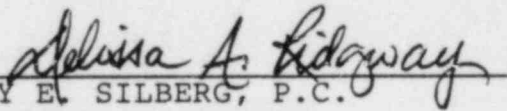
A document shall be deemed to be within the "control" of the Intervenor or of the Intervenor's attorney(s) if they have ownership, possession or custody of the document or copy thereof, or have the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

Applicants request that Intervenors produce each and every document identified or described in the answers to the above Interrogatories 1 through 12.

Respectfully submitted,

SHAW, PITTMAN, POTTC & TROWBRIDGE

BY:


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DATED: January 11, 1984

January 11, 1984

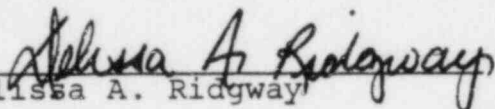
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NUCLEAR REGULATORY COMMISSION

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(Wolf Creek Generating Station,)
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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Interrogatories and Request for Production of Documents to Intervenor Wanda Christy and Mary Ellen Salava (EPZ Contention)" were served by deposit in the United States Mail, first class, postage prepaid, this 11th day of January, 1984, to all those on the attached Service List.


Delissa A. Ridgway

DATED: January 11, 1984

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NUCLEAR REGULATORY COMMISSION

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