



KANSAS GAS AND ELECTRIC COMPANY

GLEN L KOESTER
VICE PRESIDENT - NUCLEAR

May 30, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 85-139
Re: Docket No. STN 50-482
Ref: Statement of Policy on Emergency
Planning Standard
Subj: Emergency Planning 10 CFR 50.47 (b) (12)

Dear Mr. Denton:

In its February 12, 1985 decision in GUARD v. NRC, 753 1144 (D.C.Cir. 1985), the United States Court of Appeals for the District of Columbia Circuit vacated and remanded to the Commission that part of the Commission's interpretation of 10 CFR 50.47 (b) (12) which stated that a list of treatment facilities constituted adequate arrangements for medical services for individuals who might be exposed to dangerous levels of radiation at locations off-site from nuclear power plants.

On May 21, 1985, the Commission published in the Federal Register a Statement of Policy providing guidance to the NRC Staff and Atomic Safety and Licensing Boards pending completion of the Commission's response to the Court's remand (50 Federal Regulation 20892).

The Statement of Policy provides that the NRC Staff and licensing boards may find that an applicant who met the requirements of 10 CFR 50.47 (b) (12) as interpreted by the Commission prior to the GUARD decision and who commits to full compliance with the Commission's response to the GUARD remand is entitled to a license conditional on full compliance with the Commission's response.

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Mr. H.R. Denton
KMLNRC 85-139

May 30, 1985

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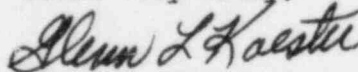
Emergency planning for the Wolf Creek Generating Station (WCGS) complies with the Commission's interpretation of 10 CFR 50.47 (b) (12) prior to the GUARD decision, requiring the listing of area medical services capable of treating off-site members of the public who are seriously irradiated. Such listing of area medical facilities is found in the State Emergency Plan (and referenced in the Coffey County Emergency Plan), both of which have been reviewed by FEMA. State of Kansas, Annex A (Nuclear Facilities Incidents Response Plan) to Assistance R (Nuclear Emergencies) of the State Disaster Emergency Plan, (June 1984) Table L-1; Coffey County Contingency Plan for Incidents Involving Commerical Nuclear Power (Rev. 3, June 1984), paragraph 3.11. The capability of the list of facilities is established in Table L-1 of the State Plan.

Kansas Gas and Electric Company, on behalf of itself and its co-licensees Kansas City Power Light Company and Kansas Electric Power Cooperative, Inc., ("Licensees"), hereby commits to fully comply with the Commission's response to the GUARD remand to the extent that such compliance is within Licensees' control. To the extent that full compliance is dependent upon action required to be taken by State and/or local government agencies, or other entities over which Licensees have no control, Licensees commit to use their best efforts to secure compliance by such agencies or entities.

On the basis of the foregoing, Licensees request that Staff make the findings authorized by the referenced Statement of Policy including, without limitation, a finding that Licensees are entitled to a license authorizing full-power operation of WCGS conditioned on full compliance with the Commission's response to the GUARD remand.

If you have any questions, please contact Mr. Otto Maynard of my staff.

Yours very truly,



Glenn L. Koester
Vice President - Nuclear

GLK:dab

xc: PO'Connor (2)
RPDenise
JCummins

STATE OF KANSAS)
) SS
CITY OF WICHITA)

Glenn L. Koester, of lawful age, being first duly sworn upon oath says that he is Vice President - Nuclear and an Officer of Kansas Gas and Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said Company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Glenn L. Koester
Glenn L. Koester
Vice President - Nuclear

SUBSCRIBED and sworn to before me this 30th day of May, 1985.



J. L. Dodge
Notary Public
Expiration Date 9.12.87