

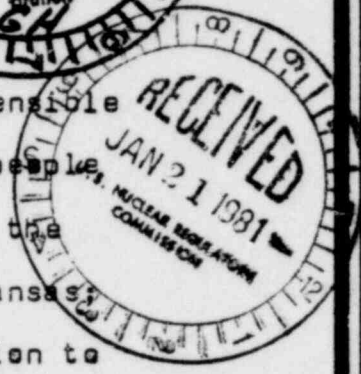
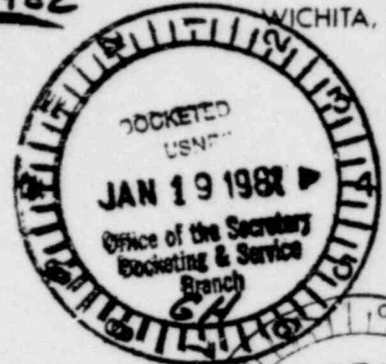
KASE

DOCKET NUMBER  
PROD. & UTIL. FACT STN-50-482

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WICHITA, KANSAS  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
Kansas, Gas, and Electric &  
Kansas City Power & Light  
(Wolf Creek Plant Unit 1)



PETITION TO INTERVENE

We the undersigned, representing Kansans for Sensible Energy (hereinafter "KASE"), a citizens group of people who will be directly affected by the operation of the Wolf Creek Nuclear Power Plant near Burlington, Kansas, do hereby petition the Nuclear Regulatory Commission to intervene in the matter of an operating license for the Wolf Creek plant.

KASE has been actively engaged in the promotion of conservation and alternative energy sources, as well as actively opposed to nuclear power for several years. Activities include formal intervention in the Wolf Creek KEPCO hearings before the Kansas Corporation Commission (KCC), participation on the KCC Consumer Information Board, and testimony given during K.G.&E. rate requests before the KCC.

Reasons for Intervention

1. Numerous construction problems have made safe operation of the plant questionable. These include a con-

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ISSUING A CALL FOR A NON NUCLEAR FUTURE

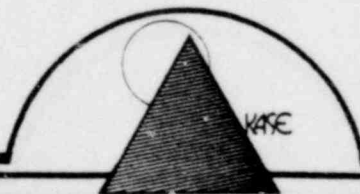
crete base mat which is riddled with voids and had some test sections which failed to meet manufacturer's specifications for strength. Also welding defects in the embeds of the SNUPPS designed Calloway, Missouri plant brings into question the embeds of the SNUPPS designed Wolf Creek plant.

2. K.G.&E. has no plan for the permanent storage of nuclear wastes, nor is there a viable plan for decommissioning the plant when its operating life is over.

3. No adequate evacuation plan exists for residents who would be affected in the case of a major incident at the plant.

4. Eastern Kansas has suffered a very dry year and, if dry conditions persist, the water used for the Wolf Creek cooling lake could have an adverse effect on the environment of Eastern Kansas.

5. In estimating the chances of a reactor accident, the original Environmental Impact Study used the reliability estimating techniques of the Rasmussen report, which have since been proven invalid.



REASON WHY PETITIONER SHOULD BE ALLOWED TO INTERVENE.

KASE is able to bring to this proceeding evidence and witnesses with respect to the operation of the Wolf Creek plant as it relates to safety and the environment which may not be included if KASE is not granted intervenor status.

ISSUING A CALL FOR A NON NUCLEAR FUTURE

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