

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

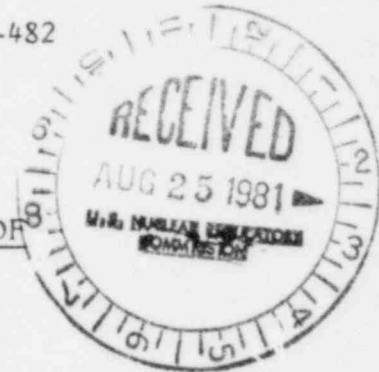


BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

8/19/81

Docket 50-482



INTERROGATORIES AND REQUESTS FOR DOCUMENTS OF
KANSANS FOR SENSIBLE ENERGY TO APPLICANTS

INTRODUCTION

The following interrogatories and requests for documents are served by the intervenor, Kansans for Sensible Energy to the applicants, Kansas Gas and Electric Company, Kansas City Power & Light Company, and Kansas Electric Power Cooperative, Inc. The interrogatories are to be answered by the officers or employees of each applicant who are cognizant of the facts relating to the interrogatory. Each interrogatory should be answered separately and fully in writing under oath. The answers shall be signed by the person making them.

The purpose of these interrogatories and requests is to discover information, documents, data, and evidence relating to the financial capability of the applicants to operate or decommission the Wolf Creek Generating Station, Unit No. 1. Each of the interrogatories and requests is directed to each of the applicants, separately, and each shall respond to all interrogatories and requests.

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DEFINITIONS

When used in these interrogatories and requests the following words shall have the following meaning:

1. "Documents" means memorandums, financial statements, schedules, exhibits, reports, letters, agreements, contracts, financial or other work papers, or other writings in custody of or prepared by each of the applicants or its officers and employees.
2. "Identify" means in regard to any document the date it was prepared, a summary of the contents thereof, the person or persons who prepared it, the persons to whom it was sent or distributed, and the present location thereof.
3. "Plant" means the applicants' Wolf Creek Generating Station, Unit No. 1, Coffey County, Kansas.

INTERROGATORIES AND REQUESTS

1. (a) What is the current estimated date of completion for the plant and the current estimated date it will be fully operational?

(b) State if the applicant has any documents relating to (a) and identify them.

2. (a) What is the estimated final cost of the plant and how is this amount calculated. Explain in detail.

(b) State if the applicant has any documents relating to (a) and identify them.

3. Provide a copy of your latest annual financial report and your latest interim financial report.

4. (a) Do you contemplate the sale of all or any part of any electric generating facility in which you own an interest at the present time?

(b) If the answer to (a) is yes, describe in detail any such contemplated sale.

(c) State if the applicant has any documents relating to (a) and

(b) and identify them.

5. (a) To what extent is the Kansas City Power and Light Company Iatan Plant now included in its rate base?

(b) When will such plant be fully included in the rate base?

(c) State if the applicant has any documents relating to (a) and (b) and identify them.

6. (a) What are the applicant's estimates of revenues, fuel costs, depreciation, income taxes, net income before and after taxes, new loans, loan repayments, amounts and terms of bond issues, and amounts and terms of common and preferred stock issues for each of the following years: 1981, 1982, 1983, and 1984?

(b) State if the applicant has any documents relating to (a) and identify them.

7. (a) When will the sale of the interest in the plant to Kansas Electric Power Cooperative, Inc. (KEPCO) be completed?

(b) When will KEPCO have the funds available to complete the purchase?

(c) What effect will a failure of KEPCO to complete the purchase of its interest in the plant have upon the financial affairs of the applicant?

(d) Describe any plans made to deal with the situation arising if KEPCO is not able to complete the purchase of the plant.

(e) Describe the status of the efforts of KEPCO to meet each of the requirements for the purchase of the plant set forth in the Kansas Corporation Commission Order dated October 22, 1980, Docket No. 120,783-U.

(f) State if the applicant has any documents relating to (a - e) and identify them.

8. (a) Describe in detail for the applicant's corporation the applicant's estimates for each of the years 1985 - 1995 of the following: (1) revenues from the sale of electricity; (2) cost of coal, natural gas, and uranium fuels; (3) interest rates for new bonds to be issued by the applicant and interest rates for any loans made to finance operations or construction; (4) operating costs other than fuel costs, interest, depreciation, and taxes; (5) book depreciation and income tax depreciation; (6) interest expenses; (7) income taxes; (8) net income before and after income taxes; (9) peak loads; (10) annual rate of inflation used in preparing the estimates;

(11) amount of electricity rate increase requests; (12) expenditures for new plant and transmission construction (list each plant); (13) book value of electric generating facilities retired from service (14) cash proceeds from common stock issue; (15) cash proceeds from preferred stock issue; (16) cash proceeds from issuance of bonds; (17) cash proceeds from loans; (18) payments to retire loans and bonds; (19) number of kilowatts of electricity sold.

(b) State if the applicant has any documents relating to (a) and identify them.

9. (a) List the applicant's estimates of the following for the plant for each of the years 1985 - 1995: (1) revenues from sales of electricity produced at the plant; (2) fuel costs for the plant; (3) a listing of the amounts of other operating costs of the plant; (4) kilowatts of electricity sold from electricity produced at the plant; (5) the percentage of capacity the plant was operating; (6) the cost per kilowatt of electricity produced at the plant; (7) the charges per kilowatt to customers for electricity produced at the plant.

(b) State if the applicant has any documents relating to (a) and identify them.

10. (a) Describe the nature and amount of the applicant's most recent rate relief actions before any state or federal agency.
 - (b) Provide copies of the rate order for the action described in (a).
 - (c) State in detail the nature and amount of any pending rate relief actions before any federal or state agency.
 - (d) Provide copies of any financial information submitted in connection with (a) or (c).
 - (e) Describe in detail any contemplated rate increase request that will be filed with any federal or state agency between now and December 31, 1986.
 - (f) Describe in detail the applicant's planning process for current and long term rate increase requests.
 - (g) State if the applicant has any documents relating to (a) - (f) and identify them.
11. (a) What is the applicant's estimated and its required rate of return on capital and on total assets for the years 1981-1995?
 - (b) State if the applicant has any documents relating to (a) and identify

them.

12. (a) What is the applicant's estimated cost of permanently shutting down the plant?

 - (b) What are the specific costs and assumptions made in estimating the cost of the type of shutdown contemplated, and what are the sources of funds to cover these costs?.

 - (c) State if the applicant has any documents relating to (a) and (b) and identify them.
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13. (a) What is the applicants estimate of the annual cost to maintain the shutdown of the plant?

 - (b) What specific costs are included in the estimate asked for in (a)?

 - (c) What is the source of funds to cover the costs estimated in (a)?

 - (d) State if the applicant has any documents relating to (a)-(c) and identify them.
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14. Provide copies of any agreements the applicant has with other applicants or others setting forth the procedure by which the applicants will share construction, operating, and decommissioning costs for the plant.

15. Provide copies of the following: (1) the applicant's most recent prospectus for its most recent bond, preferred stock, and common stock issues; (2) a copy of the applicant's most recent Securities and Exchange Commission Form 10-K; (3) copies of any preliminary prospectus for any pending bond, preferred stock, or common stock issue.

16. (a) Provide a copy of the most recent Form 1 of the Federal Energy Regulatory Commission filed with that commission.

(b) Provide a copy of the most recent Form 12 of the Federal Energy Regulatory Commission filed with that commission.

(c) Provide a copy of the most recent Form 423 of the Federal Energy Regulatory Commission filed with that commission.

(d) Provide a copy of the latest company testimony and exhibits submitted to the Federal Energy Regulatory Commission relating to rate increases sought by the applicant before the Federal Energy Regulatory Commission.

17. (a) Where are complete copies of the applicants' application for the operating license for the plant located?

(b) Describe the information contained in the application for the operating license as required by 10 CFR 50.33 (f) which relates to the financial qualifications of the applicant.

(c) Have the applicants filed all of the financial information required by 10 CFR 50.33 (f) and other regulations of the Nuclear Regulatory Commission? If not when and what else in connection with the operating license will be filed.

(d) Provide copies of all financial information required by 10 CFR 50.33 (f) and filed with the application for an operating license.

18. (a) Provide a copy of the most recent annual report and related exhibits and schedules which has been filed with the Kansas Corporation Commission or the Missouri Public Service Commission by the applicant.

(b) If the applicant has filed within the past two years, with the Kansas Corporation Commission or the Missouri Public Service Commission, any estimates of future electrical loads and power facility requirements covering a period of three or more years, provide a copy of any such estimates.

19. (a) What is the most recent rating of the applicant's common stock, preferred stock, and bonds by Moody's and Standard and Poor?

(b) Furnish copies of any correspondence, or notices from Moody's and Standard and Poor's regarding such ratings.

(c) State if the applicant has any documents relating to (a) or (b) and identify them.

20. (a) Indicate the estimated cost of permanently shutting down the facility after five and fifteen years of operation.

(b) Include a detailed list of the components of the total cost specified in (a).

(c) What are the assumptions made in estimating the cost in (a) and (b)?

(d) State if the applicant has any documents relating to (a)-(c) and identify them.

21. (a) What is the applicant's estimate of costs to permanently shut down the plant because of an accident of the nature of Three Mile Island?

(b) List in detail the components of the total cost specified in (a) and list the assumptions made in estimating such costs.

(c) State if the applicant has any documents relating to (a) and (b) and identify them.

22. The Kansas Corporation Commission has ordered the applicant, Kansas Electric Power Cooperative, Inc., to submit to the Corporation Com-

mission for its review and approval a plan for the establishment of a sinking fund sufficient to defray such applicant's portion of the expenses of decommissioning the plant based upon the projections of the applicant, Kansas Gas and Electric Company, submitted in connection with the hearings for the Kansas Corporation Commission Docket No. 120,783-U.

See page 35, of the Kansas Corporation Commission Order dated October 22, 1980..

(a) What are the projections of the applicant, Kansas Gas and Electric Company, referred to in the order for said docket?

(b) What has the applicant, Kansas Electric Power Cooperative, Inc., done to comply with the order of the Corporation Commission?

(c) State if the applicant has any documents relating to (a) or (b) and identify them.

23. (a) State in detail the plans of the applicant for retiring or abandoning all or any part of any electrical generating plant in which it owns an interest between now and 1995.

(b) State if the applicant has any documents relating to (a) and identify them.

24. (a) What are the applicant's estimated costs of storing high and low level nuclear waste produced at the plant?
- (b) What are the assumptions made by the applicant in determining the costs set forth in (a)?
- (c) State if the applicant has any documents relating to (a) and (b) and identify them.

REQUESTS FOR COPIES OF DOCUMENTS

A request made above to provide a document or writing shall be complied with by mailing or otherwise delivering a copy of the document or writing to the undersigned at 4400 Johnson Drive, Suite 110, Shawnee Mission, Kansas 66205



John M. Simpson
Attorney for Intervenor, Kansas
for Sensible Energy
4400 Johnson Drive, Suite 110
Shawnee Mission, Kansas 66205
(913) 384-9144

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(Wolf Creek Generating Station,)
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CERTIFICATE OF SERVICE

I hereby certify that copies of Interrogatories and Requests for Documents of Kansans for Sensible Energy to Applicants in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, on August 19, 1981.

James P. Gleason, Esq., Chairman
513 Gilmoure Drive
Silver Spring, MD 20901

Dr. George C. Anderson
Department of Oceanography
University of Washington
Seattle, Washington 98195

Dr. J. Venn Leeds
10807 Atwell
Houston, Texas 77096

Treva J. Hearne, Esq.
Assistant General Counsel
P. O. Box 360
Jefferson City, Mo. 65102

Jay Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20006

Wanda Christy
515 N. 1st Street
Burlington, KS 66839

Atomic Safety and Licensing
Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

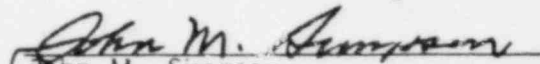
Eric A. Eisen, Esq.
Birch, Horton, Bittner & Monroe
1140 Connecticut Avenue, N.W.
Washington, D.C. 20036

Kansans for Sensible Energy
P. O. Box 3192
Wichita, Kansas 67201

Mary Ellen Salava
Route 1, Box 56
Burlington, Kansas 66839

Myron Karm an
Deputy Assistant Chief Hearing Counsel
Office of the Executive Legal Director
Nuclear Regulatory Commission
Washington, D.C. 20555

C. Edward Peterson, Esq.
Assistant General Counsel
Kansas Corporation Commission
State Office Bldg.
Topeka, KS 66612


John M. Simpson