



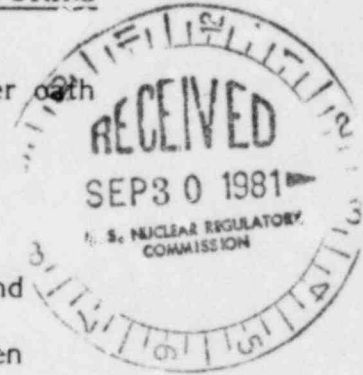
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

ANSWER OF WANDA CHRISTY TO NRC STAFF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

The intervenor, Wanda Christy, being first duly sworn states under oath
as follows:



The following are my answers to the NRC Staff Interrogatories and
Request for Production of Documents to Wanda Christy; Mary Ellen
Salava and Kansans for Sensible Energy (KASE), dated August 14, 1981:

1. (a) Our contention is that the local governments (Coffey County,
the State of Kansas, and other local units of government required to
respond to an emergency at the Wolf Creek plant) do not have a work-
able evacuation plan. To date, none of these units of government has
prepared a plan. Even though a plan has not been prepared, discussions
I have had with County Commissioners, representatives of the State of

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Kansas, and others indicate that plans being contemplated cannot be implemented because there are not enough people available to fill the positions required for the evacuation plan. Additionally, there is no evidence that governmental units are providing adequate training to people who might be involved in implementing an evacuation plan. There is no indication that such units of government have the equipment needed to implement such an evacuation plan. None of the units of government required to respond to an accident at the Wolf Creek plant and provide for the evacuation of people affected thereby has provided for any funding to carry out such an evacuation plan. Until plans are prepared and submitted, there is no evidence that a viable evacuation plan exists. Until such plans are submitted, I cannot adequately respond to this Interrogatory. However, once the plans are submitted, I will respond as requested.

(b) Until the plans of the local units of government and the state are submitted, I am not able to answer this interrogatory. At this time, we have not decided upon who will be called as a witness. However, as soon as witnesses are decided upon, the NRC Staff will be notified and furnished with the information requested in Interrogatories 1(b), 1(c), 1(d), 2 and 3.

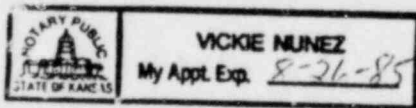
The answers set forth above on pages 1 to 2 are based on the information available to me at this time. If further information becomes available to me, I reserve the right to supplement or amend these answers and to the extent required to do so will supplement or amend these answers.

Signed this 24th day of September, 1981.

Wanda Christy
Wanda Christy

STATE OF KANSAS, COUNTY OF Johnson :

On this 24th day of September, 1981,
Wanda Christy appeared before me and being first duly sworn made and signed the above answer under oath.



Vickie Nunez
Notary Public

(Seal)

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CERTIFICATE OF SERVICE

I hereby certify that copies of Answer of Wanda Christy to NRC Staff Interrogatories and Request for Production of Documents in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, on September 24, 1981.

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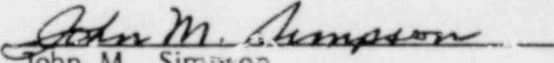
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