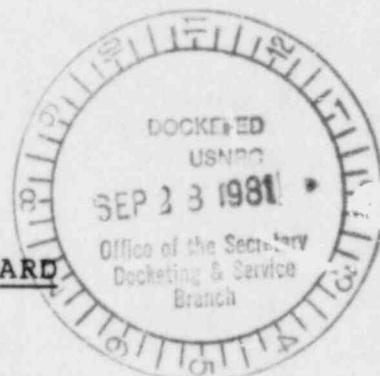


September 24, 1981

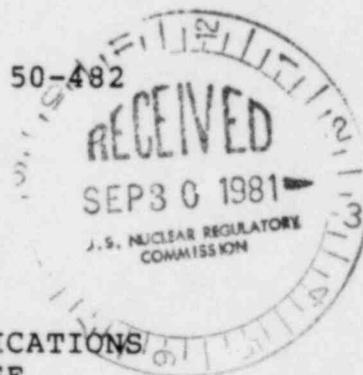
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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))

Docket No. 50-482



APPLICANTS' RESPONSES TO FINANCIAL QUALIFICATIONS
DISCOVERY REQUESTS OF INTERVENOR KASE

Interrogatory 1

- 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.

Response

- 1. (a) The present estimated completion date and full operatic.. date for the plant is mid-1984.

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- (b) Letter of October 8, 1981, G. Koester to D. Eisenhut.
Letter of June 18, 1981, W. Cadman to H. Denton.
Letter of September 15, 1981, W. Cadman to Denton.

Interrogatory 2

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.

Response

2. (a) The present estimated final construction cost of the plant is approximately 1.7 billion dollars.
- The above-estimated cost is based upon current budget estimates and calculated in conformity with Sections 8.2 and 11.2 of the Wolf Creek Generating Station, Unit No. 1, Environmental Report (Operating License Stage) ("ER"), a copy of which is being provided to counsel for intervenors under separate cover.
- (b) Wolf Creek Generating Station, Unit No. 1, Environmental Report (Operating License Stage).
- Other documents will be made available for review by counsel for intervenors in KG&F's Wichita offices.

Interrogatory 3

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

Response

3. Kansas Gas and Electric Company ("KG&E"), Kansas City Power & Light Company ("KCPL") and Kansas Electric Power

Cooperative, Inc. ("KEPCo") are providing their annual reports for 1980 to counsel for Intervenors under separate cover. KG&E and KCPL are also providing their latest interim reports. KEPCo does not have an interim report.

Interrogatory 4

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.

Response

4. KG&E

- (a) Yes.
- (b) (i) KG&E and KCPL have agreed to sell KEPCo a 17% (8.5% from each) ownership interest in Wolf Creek Unit No. 1. The sale is subject to receipt of regulatory approvals and KEPCo's permanent financing.
- (ii) KG&E and KCPL are presently negotiating with the Kansas Municipal Energy Agency, Inc. ("KMEA") for the possible sale to KMEA of a 9% (4.5% from each) ownership interest in Wolf Creek Unit No. 1, and a 4% (2% from each) ownership interest in LaCygne Units #1 and #2. These KMEA percentages

represent up to 103.5 MW of Wolf Creek and up to 54.8 MW of LaCygne Station.

- (iii) Kansas Gas and Electric Company is presently negotiating the sale of KG&E's 20% ownership in Jeffrey Energy Center, Unit 3 ("JEC 3"), with the other co-owners.
- (c) (i) Sale Memorandum dated April 19, 1979, between KG&E and KCPL.
- (ii) Letter from KG&E and KCPL to KMEA dated November 7, 1980, confirming intent of KG&E and KCPL to negotiate a sale.
- (iii) Letter of June 11, 1981. W. Cadman to co-owners regarding intent to sell JEC 3.

KCPL

4. (a) Yes.
- (b) (i) KG&E and KCPL have agreed to sell KEPCo a 17% (8.5% from each) ownership interest in Wolf Creek Unit No. 1. The sale is subject to receipt of regulatory approvals and KEPCo's permanent financing.
- (ii) KG&E and KCPL are presently negotiating with KMEA for the possible sale to KMEA of a 9% (4.5% from each) ownership interest in Wolf Creek Unit No. 1, and a 4% (2% from each) ownership interest in LaCygne Units #1 and #2. These KMEA percentages represent up to 103.5 MW of Wolf Creek and up to 54.8 of LaCygne Station.

- (c) (i) Sale Memorandum dated April 19, 1979 between KC&E and KCPL.
- (ii) Letter from KG&E and KCPL to KMEA dated November 7, 1980 confirming Intent of Applicants to negotiate a sale.

KEPCO

- 4. (a) No.
- (b) Not applicable.
- (c) Not applicable.

Interrogatory 5

- 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.

Response

- 5. (a) A complete description of the rate base treatment for Iatan is given in KCPL's most recent Missouri rate order. This is being provided to counsel for Intervenors in connection with the response to Interrogatory 10.
- (b) KCPL does not know when Iatan will be fully included in its Missouri jurisdictional rate base.
- (c) See MPSC Rate Order for Case Docket No. ER-81-42.

Interrogatory 6

- 6. (a) What are the applicant's estimates of revenues, fuel costs, depreciation, income taxes, net income before

and after taxes, new loans, loan payments, 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.

Response

6. Applicants are in the process of preparing their response, which will be provided in the near future.

Interrogatory 7

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.

Response

KG&E

7. (a) Completion of the sale to KEPCo is conditioned upon KEPCo acquiring necessary regulatory approvals and long-term financing. No definitive date has been determined for the completion of the sale at this time.
- (c) The failure of KEPCo to complete the purchase would require KG&E to finance an additional 8-1/2% interest of the Wolf Creek Plant and would result in an increase in 1982-1985 construction expenditures, including nuclear fuel, in the amount of approximately \$60 million as stated on page 6 of the April 2, 1981 Common Stock Prospectus being provided in response to Interrogatory 15. The Company would be required to repay the KEPCo advances plus interest which, as of August 31, 1981, amounts to approximately \$91.6 million, including cash advances and interest.
- (d) The obligation to repay KEPCo, should the sale by KG&E to KEPCo not be completed, is secured by a \$100 million bank line which could be utilized to repay the obligation.
- (f) KG&E's 1980 annual report to shareholders; 1981 10-K; 1981 10-Q; Loan Agreement dated October 3, 1978 and amended October 1, 1980; Letter dated February 12,

1981, H. Hansen to Irving Trust Company regarding Loan Agreement as security.

KCPPL

7. (c) KCPL will have to finance another 8.5% of the Wolf Creek Plant at an estimated total cost of \$134 million including capitalized interest and property taxes. An additional \$17 million in nuclear fuel costs will also have to be financed for fuel expenditures and capitalized interest and property taxes through 1985. As of August 31, 1981, the refund liability amounts to \$105 million including cash advances and interest.
- (d) KCPL has a loan agreement with Bankers Trust Company guaranteeing the refund liability up to \$113 million.
- (f) The Bankers Trust Company Loan Agreement and amendments.

KEPCO

7. (b) KEPCo will have funds available to complete the purchase upon final approval of the necessary loans by the REA.
- (e) All requirements contained in the referenced Kansas Corporation Commission Order have been appealed to the Shawnee County District Court. Conditions (1), (2) and (4) on page 41 of the referenced Order were eliminated or modified by the Kansas Legislature in Senate Bill 80. As to condition (4) the

Administrator of the REA has determined that full power requirement contracts are necessary to secure the loan through which KEPCo would finance an interest in Wolf Creek. Condition (3) on page 41 of the referenced Order has been satisfied. None of the other conditions in the referenced Order are conditions precedent to KEPCo's purchase of an interest in Wolf Creek.

- (f) Yes, correspondence dated July 15, 1981, from Joe S. Zeller, Assistant Administrator, REA, to Charles H. Ellis.

"Kansas County Living", July, 1981, pp. 13-18.

Kansas Corporation Commission Order dated July 13, 1981, Docket No. 120,783-U.

Certificate of Compliance filed with Kansas Corporation Commission on August 14, 1981, in Docket No. 120,783-U.

Correspondence from Philip Kassebaum to R. C. Loux dated July 8, 1981.

Interrogatory 8

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.

Response

8. Applicants are in the process of preparing their response, which will be provided in the near future.

Interrogatory 9

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.

Response

9. Applicants are in the process of preparing their response, which will be provided in the near future.

Interrogatory 10

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.

Response

KG&E

10. (a) Docket No. 121,460-U Kansas Corporation Commission
Effective 6-1-81, the Company was granted an interim rate increase amounting to \$13,872,537. This is applicable to the Company's retail customers and is being collected subject to refund pending the Commission's final determination in the Company's permanent case which was assigned Docket No. 128,139-U.

Docket No. ER77-578 Federal Energy Regulatory Commission

The Company received an increase of \$1,908,247 effective 10-19-79 on its Rural Electric Cooperative customers. Effective 1-2-81, the Company received an increase of \$1,315,840 on its full-requirements and partial-requirements municipalities.

- (b) The following orders are being provided to counsel for Intervenor under separate cover:

Docket No. 121,460-U 5-28-80

ER77-578 letter dated 10-19-79 accepting settlement agreement with rural electric cooperatives

ER77-578 Opinion No. 80 J-19-80

ER77-578 Opinion No. 80-A 8-21-80

ER77-578 Order Accepting Compliance Filing dated 1-2-81 accepting rates for full-requirements and partial requirements municipalities.

(c) Docket No. 128,139-U Kansas Corporation Commission

On May 11, 1981, the Company filed a request for an increase in rates to its retail customers of \$63,711,898. This filing also requested that \$13,872,537 granted on an interim basis in Docket No. 121,460-U be made permanent.

Docket No. ER80-259 Federal Energy Regulatory Commission

On February 29, 1980, the Company filed a request for an increase in rates to its municipal customers served at wholesale. The amount requested was \$2,800,282 for full-requirements municipalities and \$750,592 for partial-requirements municipalities.

(d) Relevant financial information submitted to the KCC or FERC will be provided for Intervenors' counsel's review at KG&E's offices in Wichita.

(e) A decision has been made to file a federal jurisdictional rate case in the last quarter of 1981. The request will be applicable to the Company's full and partial requirements municipal customers and its

rural electric cooperative customers. Certain of the partial requirements municipal customers have established Section 206 of the Federal Power Act status with the additional Sierra/Mobile burden of proof and therefore no increase will be requested for those customers. The amount of the increase to be requested and filing date have not been determined at this time.

- (f) KG&E does not forecast, specifically, the amounts to be requested as rate increases for current and long term planning. To date, rate increases filed by the Company have largely been based on the placing in service of high capital cost, coal-fired generation. This type of substantial addition to the Company's rate base and the related operating costs, taxes, and depreciation caused an instant deficiency in revenues leading to an immediate need to file for rate relief. For that reason, no detailed procedures for forecasting rate increases have been developed or have been necessary. With the potential slow down in generating capacity additions, future rate requests may be based upon other factors and at that time it is contemplated that procedures for forecasting rate increase requests will be developed.
- (g) See responses to 10(b) and 10(d). Relevant documents pertaining to 10(e) will be made available to

Intervenors' counsel for his review in KG&E's Wichita, Kansas offices. No documents presently exist with regard to 10(f). KG&E is unable to identify other responsive documents in the absence of a more specific request.

KCPL

10. (a) By its Order dated June 17, 1981 in Case No. ER 81-42, the Missouri Public Service Commission ("MPSC") granted KCPL an increase in retail electric revenue effective July 3, 1981 of approximately \$17.2 million or 5.8% of test year (1980) basic revenue. Of this amount approximately \$4.2 million or \$.00068 per kilowatt-hour is subject to revision pursuant to the Stipulation and Agreement on forecasted fuel costs approved in the Report and Order (Appendix B). By its Order dated May 28, 1980 in Docket No. 119,812-U the State Corporation Commission of the State of Kansas granted KCPL an increase in retail electric revenue effective June 1, 1980 of approximately \$24.5 million or 14.49% of basic revenue plus \$.000618 per kilowatt-hour. Hearings were concluded on September 10, 1981 on the Company's request to increase electric revenue on a permanent basis by \$49.1 million (which includes \$24.5 million previously granted on an interim basis). To date the Commission has not issued its Order relating to the

Company's request in Docket No. 127,486-U. By its Order dated March 10, 1981, the MPSC granted KCPL an increase in steam heat revenue effective March 20, 1981 of approximately \$800,000 or 23.7% of (1980) test year revenue.

On January 6, 1981, new wholesale firm electric rates designed to increase annual revenues by \$4.7 million or 32.8%, went into effect, subject to refund, as authorized by the Federal Energy Regulatory Commission (FERC). The Company's request, based on a test year ending May 31, 1981, was filed on June 6, 1981 and includes construction work in progress (CWIP) related to pollution control facilities. Also pending with FERC is a request for a \$7.4 million increase, which combines the above amount and general CWIP. Hearings on these cases have been concluded but to date FERC has not issued an Order relating to these requests.

- (b) Copies are being provided to counsel for Intervenors under separate cover.
- (c) Missouri -- See transmittal letter, being provided to counsel for Intervenors under separate cover.
Kansas -- See (a) above.
FERC -- See (a) above.
- (d) These documents will be provided to counsel for Intervenors for review at KG&E's Wichita office.

- (e) This information cannot be determined at the present time.
- (f) See response to 10(e).
- (g) KCPL cannot identify "documents" unless a specific document related to a specific subject or topic is requested.

KEPCO

- 10. (a) On July 23, 1981, KEPCo filed a formal application with the Kansas Corporation Commission seeking approval of initial interim wholesale power rates for various member cooperatives at certain delivery points. The Kansas Corporation Commission, by order dated July 31, 1981 and mailed August 3, 1981, granted the application subject to certain findings.
- (b) Being provided to counsel for Intervenors under separate cover is a copy of this Order dated July 31, 1981 granting the initial interim wholesale power rates.
- (c) At the present time, KEPCo has no pending rate relief actions before any federal or state agency.
- (d) The financial information submitted to the Kansas Corporation Commission is being provided to counsel for Intervenors under separate cover.
- (e) KEPCo is presently preparing wholesale power rates applicable to its member cooperatives. When completed, this rate case will be filed with the Kansas Corporation Commission.

- (f) The Board of Trustees of KEPCo at such intervals as it shall deem appropriate, but in any event not less frequently than once in each calendar year, shall review all applicable rate schedules and/or tariffs.
- (g) Financial information submitted to the Kansas Corporation Commission and the Order from the Kansas Corporation Commission pertaining to the interim wholesale rate dated July 31, 1981.

Interrogatory 11

- 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.

Response

KG&E

- 11. (a) Kansas Gas and Electric Company has requested a 17 1/4% rate of return on equity and an 11.93% rate of return on rate base in its current state rate case based upon the year 1980. It is the Company's belief that these rates of return to the Company would continue to be valid, varying from year to year based upon then current economic conditions. No year to year estimates are presently available. The Company cannot determine if and to what extent a regulatory body may adopt these rates of return.

(b) State rate case filings for Docket No. 121,460-U.

KCPL

11. (a) and (b) This data is presently being revised and at such time as it is available, the responses will be provided to counsel for Intervenors.

KEPCO

11. (a) KEPCo's estimated return on capital is not available. KEPCo expects to set rates at least sufficient to pay all operating costs and debt service on loans. Other than that, there is no required return on capital.

(b) REA mortgage.

Interrogatory 12

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.

Response

12. (a) Present plans for decommissioning (permanently shutting down the plant) are described in Section 5.8 of the ER.
- (b) See (a) above.
- (c) The ER is being provided to counsel for Intervenors under separate cover. Other relevant documents are

available for review by counsel for Intervenors at
KG&E's Wichita office.

Interrogatory 13

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.

Response

13. See response to Interrogatory 12.

Interrogatory 14

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.

Response

14. These documents are being provided under separate cover to counsel for Intervenors.

Interrogatory 15

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.

Response

KG&E

15. KG&E is providing to counsel for Intervenor, under separate cover, documents responsive to (1) and (2). KG&E has no pending bond, preferred stock, or common stock issue.

15. KCPL

KCPL is providing to counsel for Intervenor, under separate cover, documents responsive to (1) and (2). KCPL is also providing, under separate cover, a copy of the prospectus for its pending bond issue. KCPL has no pending preferred or common stock issue.

15. KEPCO

KEPCo does not have any of the requested documents.

Interrogatory 16

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.

Response

16. (a)-(d) KG&E and KCPL will make available the documents requested for review by counsel for Intervenors at KG&E's Wichita office. KEPCo has no documents responsive to this request.

Interrogatory 17

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.

Response

17. (a) Copies of the applicant's application for the operating license which are available for public inspection are located at the Local Public Document Room at the William Allen White Library, Emporia State University, Emporia, Kansas and at the NRC Public Document Room, 1717 H Street, Washington, D.C.

(b) Information in the Wolf Creek Generating Station, Unit No. 1, Operating License Application which is required by 10 CFR 50.33(f) and relates to the financial qualifications of the applicants is provided in the following documents:

1. The annual reports of the Applicants filed with the Operating License Application on February 19, 1980, and annually as required by 10 CFR 50.71(b).
2. Environmental Report (Operating License Stage) Sections 1.1, 1.3, 5.8, 8.1, 8.2, 9.1, 11.1 and 11.2.

(c) No. The NRC proposed in the August 18, 1981 Federal Register that financial qualifications reviews in operating license proceedings be eliminated except in the decommissioning area. With respect to decommissioning, the proposed rule has two alternatives, one of which eliminates financial qualifications for decommissioning while the other does not. Should the

proposed rule be adopted prior to January 1982, Applicants plan to file in January 1982 whatever financial qualifications information is required under the rule as adopted. Should the proposed rule be rejected or not adopted prior to January 1982, Applicants plan to file with the NRC that information currently required by 10 CFR 50.33(f).

- (d) All available responsive financial information is included in the ER and the annual reports being provided to counsel for Intervenors under separate cover.

Interrogatory 18

- 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.

Response

- 18. (a) FERC Form 1 represents the annual report filed by KG&E and KCPL. These documents will be made available to Intervenor's counsel for review at

KG&E's Wichita office. KEPCo's annual report to the Kansas Corporation Commission is being provided to counsel for Intervenors under separate cover.

- (b) These documents are being provided to counsel for Intervenors under separate cover.

Interrogatory 19

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.

Response

KG&E

19. (a) KG&E's preferred stock and First Mortgage Bonds are rated by Moody's and Standard and Poor's ("S&P") as follows:

	<u>Moody's</u>	<u>S&P</u>
First Mortgage Bonds	Baa	BBB
Preferred Stock	ba	BBB-
Common Stock	--	B+

- (b) Copies are being provided to counsel for Intervenors under separate cover.
- (c) See response to (b) above.

KCPL

19. (a) KCPL's most recent ratings are as follows:

	<u>Moody's</u>	<u>S&P</u>
First Mortgage Bonds	A	A
Unsecured Pollution Control Bonds	3aa	BBB
Preferred Stock	a	A-
Common Stock	--	A-

(b) Documents supporting these ratings are being provided to counsel for Intervenor under separate cover.

(c) See response to (b) above.

KEPCO

19. (a)-(c) KEPCo has no such ratings or documents pertaining thereto.

Interrogatory 20

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.

Response

20. (a)-(c) All present plans for decommissioning (permanently shutting down the plant) are described in Section 5.8 of "Wolf Creek Generating Station Unit No. 1, Environmental Report Operating License Stage".
- (d) See response to Interrogatory 12(c).

Interrogatory 21

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.

Response

21. (a)-(b) All present plans for decommissioning (permanently shutting down the plant) are described in Section 5.8 of the ER.
- (c) See response to Interrogatory 12(c).

Interrogatory 22

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

submit to the Corporation Commission 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.

Response

22. (a) All present plans for decommissioning are described in Section 5.8 of the ER.
- (b) The conditions in the order of the Kansas Corporation Commission have been appealed to the Shawnee County District Court. KEPCo has prepared and sent out a prospectus. KEPCo has obtained a determination from the Administrator of the Rural Electrification Administration as to the contracts necessary to

secure the loan with which KEPCo will finance an interest in Wolf Creek.

- (c) With respect to (a) above, see response to Interrogatory 12(c). With respect to (b) above, see KEPCo's response to Interrogatory 7(f).

Interrogatory 23

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.

Response

KG&E

23. (a) KG&E currently has plans developed through 1992; no retirements or abandonments of any electrical generating plant are currently contemplated. See ER, Table 1.1-4b.
- (b) The ER is being provided to counsel for Intervenors under separate cover.

KCPL

23. (a) For planning purposes, KCPL projects the retirement of Northeast Station steam units (80 MW) by no later than 1984. KCPL projects the retirement of Grand Avenue Station (70 MW) in two increments - 30 MW in 1982 and 40 MW in 1990. The turbine-generators in

question all exceed forty years of service, and in certain cases approach sixty years of service.

- (b) KCPL's Load and Capacity Planning Scenario, dated October 6, 1980.

KEPCO

23. (a) KEPCo presently has no generating facilities, and has no plans to retire any prior to 1995.
- (b) Not applicable.

Interrogatory 24

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.

Response

24. (a)-(c) Storage of primary and secondary nuclear waste (high and low level nuclear waste) is anticipated to be accomplished by enclosing the material in suitable drums and storing them in a portion of the plant. The costs for that portion of the plant to be utilized for storage has not been estimated; accordingly, there are no related documents.