



4. Coffey County cannot provide ambulances for emergency patients and at the same time provide for evacuation of hospital patients.
5. Coffey County Hospital cannot provide for the special treatment of emergency patients and at the same time assist with evacuation of its regular patients.
6. Coffey County cannot provide radiological monitoring.
7. Coffey County cannot provide adequate traffic control and roadblocks.
8. Coffey County cannot provide for decontamination at roadblocks.
9. Coffey County cannot adequately aid in providing transportation for evacuation for those who do not have their own means of transportation.
10. The State of Kansas Department of Emergency Preparedness is not adequately staffed to provide the necessary training for personnel involved with the emergency evacuation plan and it does not have sufficient personnel to conduct emergency preparedness drills.

11. Coffey County cannot provide security for evacuated area.
12. Coffey County cannot carry out the duties assigned to the New Strawn EOC.
13. Coffey County cannot provide security for the Coffey County Courthouse in the event of an emergency.
14. Coffey County cannot provide adequate dispatchers to handle communications.
15. Coffey County cannot clear and sand evacuation routes in the event of snow and adverse weather.
16. Coffey County cannot assist with evacuation of nursing homes.

EP-5. With respect to each function listed in your answer to Interrogatory EP-4 above, indicate (a) the approximate number of personnel available to perform that function in an evacuation and (b) the number of additional personnel you contend are required to successfully implement that function in an evacuation.

11. Coffey County cannot provide security for evacuated area.
12. Coffey County cannot carry out the duties assigned to the New Strawn EOC.
13. Coffey County cannot provide security for the Coffey County Courthouse in the event of an emergency.
14. Coffey County cannot provide adequate dispatchers to handle communications.
15. Coffey County cannot clear and sand evacuation routes in the event of snow and adverse weather.
16. Coffey County cannot assist with evacuation of nursing homes.

EP-5. With respect to each function listed in your answer to Interrogatory EP-4 above, indicate (a) the approximate number of personnel available to perform that function in an evacuation and (b) the number of additional personnel you contend are required to successfully implement that function in an evacuation.

Response:

<u>Response No. in EP-4</u>	<u>No. of People Required</u>	<u>No. Available</u>
1	2	1 Emergency Planning Coordinator
2	67	10 Sheriff dept. and 3 Burlington Police
3	2	1 Sheriff
4	6	--
5	6	--
6	45	1 Radiological Monitor
7	212	35 National Guard
8	16	8 Burlington Fire Dept.
9	50	--
10	3	--
11	45	10 Sheriff Dept. and 3 Burlington Police
12	3	--
13	6	--
14	9	5 Dispatchers
15	34	22 Road and Bridge Crew
16	15	--

EP-7. Identify any personnel of "governmental bodies" which you contend lack sufficient training to perform their assigned functions in an evacuation.

- Response:
1. The Coffey County Emergency Preparedness Coordinator.
  2. The Coffey County Sheriff.
  3. The Coffey County Engineer.
  4. The personnel of the Coffey County Ambulance Service.
  5. The Coffey County Hospital staff.
  6. The Coffey County Radiological Monitoring Team.
  7. The members of the Kansas National Guard Unit in Burlington, Kansas.
  8. The personnel of the city of Burlington Fire Department and the personnel of other fire departments within Coffey County.

9. The members of the Burlington City Police Department and other police departments within Coffey County.
10. The personnel of the State Department of Emergency Preparedness.
11. The personnel of the Coffey County road department.

EP-8. With respect to each governmental body referred to in your answer to interrogatory EP-7 above, specify the function(s) which that body is relied on to perform in an evacuation, but which you contend its personnel are not properly trained to perform.

- Response:
1. The Coffey County Emergency Preparedness Coordinator. Advice to sheriff about protective action to take; locating, storing, and distribution of emergency equipment; training personnel about evacuation duties and emergency equipment; have knowledge about radiation monitoring, decontamination processes, and use of protective gear; understanding duties of each person involved in the plan; conducting evacuation drills; training public about how to respond to an emergency; evacuation of people who lack transportation.
  2. Coffey County Sheriff. Coordination of evacuation process; knowledge of plan to advise people about duties and how to implement their duties; training of personnel to conduct evacuations; conduct of evacuation plan drills; notification of radiological emergency; management of roadblocks and traffic control; security of evacuated area; evacuation of persons without transportation.

3. Coffey County Engineer. Cleaning and maintaining of roads in bad weather; operation of roadblocks and traffic control.
4. Coffey County Ambulance Service. Evacuation of patients at hospital and coordination of that duty with treatment of individuals injured in an emergency.
5. Coffey County Hospital Staff. Evacuation of patients at hospital.
6. Coffey County Radiological Monitoring Team. Taking an evaluation of radiation levels; operation of radiological monitoring equipment; knowledge about allowable radiation dosages. In fact, the team does not exist at the present time. Use of protective gear.
7. Members of Kansas National Guard Unit in Burlington. Management of roadblocks and traffic control; evacuation of nursing homes and others; use of protective gear.
8. Personnel of the City of Burlington Fire Department and the personnel of other fire departments within Coffey County. Decontamination process at roadblocks and checkpoints; use of protective gear during the evacuation process.

9. The Burlington City Police Department and other police departments within Coffey County. Giving of initial warnings; security of area after evacuation; traffic control, and management of roadblocks.
10. Personnel of the State Department of Emergency Preparedness. Training of people involved in the plan and the conduct of emergency planning drills.
11. Personnel of the Coffey County Road Department; management and assistance at roadblocks.

EP-9. With respect to each function listed in your answer to Interrogatory EP-8 above, describe in detail the training which the personnel must receive in order to successfully perform that function in an evacuation.

Response: Each individual who has responsibility in the plan must be given training by the State Department of Emergency Preparedness, the Coffey County Emergency Preparedness Coordinator, and his immediate supervisor about the responsibilities that the individual has in the evacuation plan. The individual must be given training about the overall nature of the plan so that he can understand how his role fits in with the total plan. The individual must

know exactly what he is to do, when he is to do it, and how it is to be done. He must also be given training about operating any special communications, decontamination, or other equipment. He must be instructed in the use of protective gear if he will be using such gear. Drills must be conducted in which all of the individuals are involved. Training must be done on a periodic basis so that the individual continues to be updated about changes in the plan and has his duties reinforced in his mind. Each person should be given instruction about the legalities of his activities and the extent of his authority to compel others to assist.

EP-11. Identify each of the "governmental bodies" which you contend are insufficiently equipped to successfully implement an evacuation.

Response: Coffey County, the City of Burlington, and each of the other cities located within Coffey County.

EP-12. With respect to each governmental body listed in your answer to Interrogatory EP-11 above, describe each piece of equipment which that body does not now have but which you contend is required to successfully implement an evacuation, and explain why each such piece of equipment is required to successfully implement an evacuation.

Response: 1. The fire departments of the City of Burlington and other cities in Coffey County do not have sufficient radiation monitoring equipment that will detect radiation. They do not have five

tank trucks for use at decontamination stations. They do not have radio equipment which is needed to communicate with the sheriff's office.

2. The Coffey County Sheriff's Department does not have sufficient equipment for warning people in the event of an emergency requiring an evacuation. In order to provide for proper notification and communication, the following are required: vehicles with loud speakers - 57; and tone alerts for each home - 3500. The department also needs radiation monitoring equipment and sealed vehicles for patrol of contaminated areas.
3. Coffey County does not have sufficient sirens needed to warn people in the event of an emergency. Twenty will be required.
4. The Coffey County Road Department needs radio equipment for its vehicles to communicate with the sheriff and others in the event of an emergency. The road department will also need 66 barriers to control entry to the ten mile EPZ. It has approximately twenty; therefore, forty-six are still required.
5. If the communications frequency is changed, the Coffey County Ambulance Department needs radio equipment to communicate with the sheriff's office and others. This will require equipment for 2 vehicles.

6. Coffey County will need litters to evacuate nursing home patients. Ten litters will be needed for the Sunset Manor Nursing Home, and twenty litters would be needed for the Golden Age Lodge Nursing Home in Burlington. Two litter buses will be required to provide for the evacuation of nursing homes.
7. The Coffey County Radiation Monitoring Team does not have proper radiation monitoring equipment to monitor radiation in the event of an evacuation. Additionally, the team should be equipped with portable communications equipment for contacting others involved in an emergency or an evacuation process. Communications equipment for 18 people is required.
8. Protection gear for protection against radiation is needed for all workers who are involved in the evacuation plan. Three hundred fifty people will be involved in three shifts. If so, 116 sets of protective gear are required.

EP-15. With respect to each governmental body identified in your answer to Interrogatory EP-14, specify the amount of additional funds you contend is necessary for successful implementation of evacuation plans.

Response: 1. Coffey County, \$740,500.00 (for first 5 years of plant operation)

2. Kansas Emergency Preparedness Office, \$27,000.00 for initial training and \$20,000.00 for training each year thereafter.

EP-16. With respect to each amount identified in your answer to Interrogatory EP-15, describe in detail what you contend the proposed additional amount should be used to fund.

Response: (All Coffey County except as noted.)

Firetrucks for use at roadblocks (5)	\$100,000
Loudspeakers for warning cars	11,400
Warning tone alerts for residences and businesses	105,000
Litter buses for nursing home evacuation	25,000
Litters	1,500
Monitors (Radiological)	25,000
Road barriers for roadblocks	4,600
Protective gear	58,000
Communications equipment	50,000
Sirens	160,000
Annual maintenance of equipment (5 yrs. x 10,000)	50,000
Training - Initial	27,000*
Annual (5 yrs. x 20,000)	100,000*
Compensation - Emergency (5 days)	75,000
Training (5 yrs.)	75,000
	<u>\$867,500</u>

\*Kansas Emergency Preparedness Office

EP/FQ. With respect to each individual whom you intend to call as a witness in this proceeding:

- a. Identify by name and address each such individual;
- b. State the educational and professional background of each such individual, including occupation and institutional

affiliations, publications and papers;

- c. Identify the contention as to which each such individual will testify;
- d. Describe, to the extent known, the nature of the testimony which may be presented by each such individual;
- e. Identify by court, agency or other body, proceeding, date, and subject matter all prior testimony by each such individual.

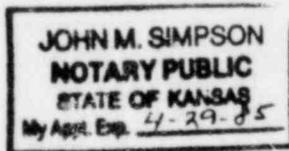
Response: At this time, I have not decided upon who will be called as a witness. However, as soon as witnesses are decided upon, the applicants will be notified and furnished with the information requested in Items a - e, of this Interrogatory.

The answers set forth above on pages 1 to 12 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 22nd day of January, 1982.

Wanda Christy  
Wanda Christy

STATE OF KANSAS, COUNTY OF Johnson :

On this 22nd day of January, 1982, Wanda Christy appeared before me and being first duly sworn made and signed the above answer under oath.



John M. Simpson  
Notary Public

(Seal)

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of Supplemental Answers of Intervenor Christy to Emergency Planning Interrogatories in the above captioned proceeding have been served on the following by deposit in the United States mail first class, on January 22, 1982.

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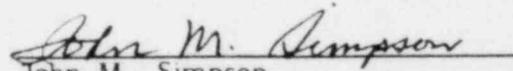
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