

RECEIVED CORRESPONDENCE

DOCKETED April 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

APPLICANTS' SECOND SET OF
INTERROGATORIES TO INTERVENOR CHRISTY

These interrogatories pertain to the "Answer of Intervenor Christy To Applicants' First Set of Interrogatories" (September 24, 1981) and the "Supplemental Answers of Intervenor Christy to Emergency Planning Interrogatories" (January 22, 1982), and are filed pursuant to 10 C.F.R. § 2.740b, which requires that the interrogatories be answered separately and fully in writing and under oath or affirmation, within 14 days after service. The interrogatories are intended to be continuing in nature and the answers should immediately be supplemented or amended, as appropriate, should Intervenor obtain any new or differing information responsive to the interrogatories.

INTERROGATORIES

1. Your response number 1 to Interrogatory EP-5 states that 2 people (in addition to the Emergency Planning Coordinator) are required for Coffey County to provide training for personnel in evacuation procedures and other procedures required for personnel to implement an evacuation plan. Explain in detail how you determined that 2 additional people were required to carry out this function and provide all assumptions on which this explanation is based.
2. Your response number 2 to Interrogatory EP-5 states that 67 people (in addition to 10 available Sheriff's Department personnel and 3 available Burlington Police Department personnel) are required for Coffey County to make "the initial notification of an emergency in the required time."
 - a. What is "the required time" and where (and by whom) is it required?
 - b. Explain in detail how you determined that 67 additional people were required to carry out this function and provide all assumptions on which this explanation is based.
3. Your response number 3 to Interrogatory EP-5 states that 2 people (in addition to the Sheriff) are required for Coffey County to adequately direct the evacuation.

Explain in detail how you determined that 2 additional people were required to carry out this function and provide all assumptions on which this explanation is based.

4. Your response number 4 to Interrogatory EP-5 states that 6 people are required for Coffey County to provide ambulances and at the same time provide for evacuation of hospital patients. Explain in detail how you determined that 6 people were required to carry out this function and provide all assumptions on which this explanation is based.
5. Your response number 5 to Interrogatory EP-5 states that 6 people are required for the Coffey County Hospital to provide for special treatment of emergency patients and at the same time assist with evacuation of its regular patients.
 - a. Explain in detail how you determined that 6 people were required to carry out this function and provide all assumptions on which this explanation is based.
 - b. How many (if any) emergency patients from the Wolf Creek site did you assume would be treated at the Coffey County Hospital concurrent with an evacuation?
 - c. Can the functions identified in your responses numbers 4 and 5 to Interrogatory EP-5 be performed by the same 6 people, or do you assert that 6 people are required to perform the functions identified in your

response number 4 in addition to the 6 people needed to perform the functions identified in your response number 5?

6. Your response number 6 to Interrogatory EP-5 states that 45 people (in addition to 1 available Radiation Monitor) are required for Coffey County to provide radiological monitoring. Explain in detail how you determined that 45 additional people were required to carry out this function and provide all assumptions on which this explanation is based.
7. Your response number 7 to Interrogatory EP-5 states that 212 people (in addition to 35 available National Guard) are required for Coffey County to provide adequate traffic control and roadblocks.
 - a. Explain in detail how you determined that 212 additional people were required to carry out this function and provide all assumptions on which this explanation is based.
 - b. Identify all bases for your statement that 35 National Guard personnel are available to carry out this function.
8. Your response number 8 to Interrogatory EP-5 states that 16 people (in addition to 8 available Burlington Fire Department personnel) are required for Coffey County to provide for decontamination at roadblocks. Explain in detail how you determined that 16 additional people were

required to carry out this function and provide all assumptions on which this explanation is based.

9. Your response number 9 to Interrogatory EP-5 states that 50 people are required for Coffey County to adequately aid in providing transportation for evacuation for those who do not have their own means of transportation. Explain in detail how you determined that 50 people were required to carry out this function and provide all assumptions on which this explanation is based.
10. Your response number 10 to Interrogatory EP-5 states that 3 people are required for the State of Kansas Department of Emergency Preparedness to provide the necessary training for personnel involved with the emergency evacuation plan and to conduct emergency preparedness drills. Explain in detail how you determined that 3 people were required to carry out this function and provide all assumptions on which this explanation is based.
11. Your response number 11 to Interrogatory EP-5 states that 45 people (in addition to 10 available Sheriff's Department personnel and 3 available Burlington Police Department personnel) are required for Coffey County to provide security for evacuation areas. Explain in detail how you determined that 45 additional people were required to carry out this function and provide all assumptions on which this explanation is based.

12. Your response number 12 to Interrogatory EP-5 states that 3 people are required for Coffey County to carry out the duties assigned to the New Strawn EOC.
- a. Specify the duties to be carried out by Coffey County at the New Strawn EOC.
 - b. Explain in detail how you determined that 3 people were required to carry out those duties and provide all assumptions on which this explanation is based.
13. Your response number 13 to Interrogatory EP-5 states that 6 people are required for Coffey County to provide security for the Coffey County Courthouse in the event of an emergency. Explain in detail how you determined that 6 people were required to carry out this function and provide all assumptions on which this explanation is based.
14. Your response number 14 to Interrogatory EP-5 states that 9 people (in addition to 5 available Dispatchers) are required for Coffey County to provide adequate dispatchers to handle communications. Explain in detail how you determined that 9 additional people were required to carry out this function and provide all assumptions on which this explanation is based.
15. Your response number 15 to Interrogatory EP-5 states that 34 people (in addition to 22 available Road and Bridge Crew members) are required for Coffey County to clear and sand evacuation routes in the event of snow and adverse

weather. Explain in detail how you determined that 34 additional people were required to carry out this function and provide all assumptions on which this explanation is based.

16. Your response number 16 to Interrogatory EP-5 states that 15 people are required for Coffey County to assist with evacuation of nursing homes.

- a. Identify all nursing homes within a 10 mile radius of the Wolf Creek facility which would be evacuated.
- b. Explain in detail how you determined that 15 people were required to carry out this function and provide all assumptions on which this explanation is based.

17. Your response number 1 to Interrogatory EP-12 states that 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".

- a. Identify each of the other cities in Coffey County to which you refer.
- b. Explain in detail why the fire departments need radiation monitoring equipment.
- c. Identify any statute, regulation or regulatory guidance on which your answer to b. above is based.
- d. Specify the type and number of pieces of equipment now available, the type and number of additional pieces of equipment which you believe are required, and provide all assumptions on which your answers are based.

18. Your response number 1 to Interrogatory EP-12 states that the fire departments of the City of Burlington and other cities in Coffey County "do not have five tank trucks for use at decontamination stations".
- a. Explain why tank trucks (as opposed to other types of equipment) are required.
 - b. Explain in detail how you determined that five tank trucks are required and provide all assumptions on which this explanation is based.
19. Your response number 1 to Interrogatory EP-12 states that the fire departments of the City of Burlington and other cities in Coffey County "do not have radio equipment which is needed to communicate with the sheriff's office."
- a. Explain why the fire departments need to communicate with the Sheriff's Department.
 - b. Specify the type and number of pieces of radio equipment now available, the type and number of additional pieces of equipment which you believe are required, and provide all assumptions on which your answers are based.
 - c. Explain why the radio equipment (if any) now used by the fire departments is inadequate to allow the fire departments to communicate with the Sheriff's office.
20. Your response number 2 to Interrogatory EP-12 states that 57 vehicles with loud speakers and 3500 tone alerts for homes are needed in order to provide for proper notification and communication.

- a. Explain why tone alerts for each home are needed in view of the proposed installation of a siren system and provide all assumptions on which this explanation is based.
 - b. Identify any statute, regulation, or regulatory guidance which requires installation of tone alerts in each home.
 - c. Explain in detail how you determined that 3500 tone alerts were required and provide all assumptions on which this explanation is based.
 - d. Explain in detail how you determined that 57 vehicles with loud speakers were required and provide all assumptions on which this explanation is based.
21. Your response number 3 to Interrogatory EP-12 states that twenty sirens are needed to warn people in the event of an emergency. Explain in detail how you determined that twenty sirens are required and provide all assumptions on which this explanation is based.
22. Your response number 4 to Interrogatory EP-12 states that 66 barriers are needed to control entry to the ten mile EPZ. Explain in detail how you determined that 66 barriers were needed and provide all assumptions on which this explanation is based.
23. Your response number 5 to Interrogatory EP-12 states that if the communications frequency is changed, the Coffey County Ambulance Department will need radio equipment to communicate with the Sheriff's office and others.

- a. Is it your belief that the communications frequency will be changed?
 - b. If that is your belief, explain in detail the basis for this belief.
24. Your response number 6 to Interrogatory EP-12 states that ten litters will be needed to evacuate the Sunset Manor Nursing Home and twenty litters to evacuate the Golden Age Lodge Nursing Home. Explain in detail how you determined that ten and twenty litters, respectively, were required to evacuate these nursing homes and provide all assumptions on which this explanation is based.
25. Your response number 6 to Interrogatory EP-12 states that two litter buses will be required for evacuation of nursing homes.
- a. Explain why litter buses (as opposed to other types of equipment) are required.
 - b. Explain in detail how you determined that two litter buses were needed and provide all assumptions on which this explanation is based.
26. Your response number 7 to Interrogatory EP-12 states that the Coffey County Radiation Monitoring Team does not have "proper radiation monitoring equipment to monitor radiation in the event of an evacuation".
- a. Describe the type of radiation monitoring equipment which is "proper".
 - b. Identify any statute, regulation, or regulatory guidance on which your answer to a. above is based.

- c. Explain in detail why the type of radiation monitoring equipment identified in your response to a. above is needed.
 - d. Specify the quantity of radiation monitoring equipment which the Radiation Monitoring Team now has available, the quantity of additional equipment which you assert it should have, explain in detail how you determined this quantity and provide all assumptions on which this explanation is based.
27. Your response number 7 to Interrogatory EP-12 states that the Coffey County Radiation Monitoring 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."
- a. Specify the type and number of pieces of communications equipment now available, the type and number of additional pieces of equipment which you believe are required, and provide all assumptions on which your answers are based.
 - b. Identify specifically the "others involved in an emergency or an evacuation process" with whom you assert the Monitoring Team would need to communicate.
 - c. Explain in detail why the type of communications equipment identified in your response to a. above is needed.

- d. Explain in detail how you determined that communications equipment for 18 people would be required, and provide all assumptions on which this explanation is based.
28. Your response number 8 to Interrogatory EP-12 states that 350 workers will be involved in the evacuation plan who will need protective gear against radiation.
- a. Explain in detail how you determined that 350 workers would be involved and provide all assumptions on which this explanation is based.
 - b. Describe the type of protective gear which you believe is required, explain in detail why such gear is required, and provide all assumptions on which this explanation is based.
29. Your responses to Interrogatories EP-15 and EP-16 specify the amount of additional funds which you contend are necessary for successful implementation of evacuation plans by Coffey County and the Kansas Emergency Preparedness Office, and the items which these additional amounts should be used to fund. Explain in detail how each of the additional amounts specified in your response to Interrogatory EP-16 was determined and provide all assumptions on which this explanation is based.
30. Your response to Interrogatory EP-17 states that the evacuation plan(s) are rendered unworkable by "too much reliance on utility company personnel."

- a. Identify all functions presently assigned to utility company personnel which you assert should not be assigned to utility company personnel.
 - b. With respect to each function identified in your response to a. above, explain why reliance should not be placed on utility company personnel to perform that function.
31. Your response to Interrogatory EP-17 states that "[n]ot enough consideration has been given to adverse weather conditions."
- a. Identify each aspect of evacuation planning as to which you contend inadequate consideration has been given to adverse weather conditions.
 - b. With respect to each aspect of evacuation planning identified in your response to a. above, describe the adverse weather conditions which you assert have been inadequately considered.
 - c. With respect to each aspect of evacuation planning identified in your response to a. above, explain why adverse weather conditions should be considered and how greater consideration should be given to such conditions.
32. With respect to each of your answers to Interrogatories 1 through 31 above, answer General Interrogatories 1 through 4.

GENERAL INTERROGATORIES

1. Is your answer based upon one or more documents?^{1/} If so:
 - a. Identify each such document on which your answer is based.
 - b. Identify the information in each document on which your answer is based.
 - c. Explain how such information provides a basis for your answer.
2. Is your answer based upon any type of study, calculation, or analysis? If so:
 - a. Describe the nature of the study, calculation, or analysis and identify any documents which discuss or describe the study, calculation, or analysis.
 - b. Who performed the study, calculation, or analysis?
 - c. When and where was the study, calculation, or analysis performed?
 - d. Describe in detail the information that was studied, calculated, or analyzed.
 - e. What were the results of such study, calculation, or analysis?

^{1/} For the purpose of these General Interrogatories, "documents" means all writings and records of every type in the possession, control or custody of Intervenor, including but not limited to memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, speeches, articles, transcripts and all other records, written, electrical, mechanical or otherwise.

"Documents" shall also mean copies of documents even though the originals thereof are not in the possession, custody or control of Intervenor.

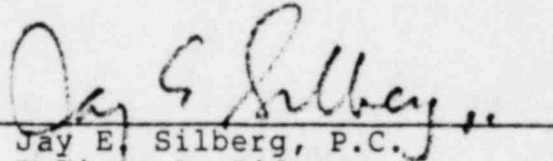
- f. Explain how such study, calculation, or analysis provides a basis for your answer.
3. Is your answer based upon research? If so:
- a. Describe all such research and identify each document discussing or describing such research.
 - b. When and where was the research conducted?
 - c. By whom was the research conducted?
 - d. Explain how such research provides a basis for your answer.
4. Is your answer based upon conversations, consultations, correspondence or any other type of communications with one or more individuals? If so:
- 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.
 - c. Describe the nature of each communication with each such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from each such individual and explain how it provides a basis for your answer.

- e. Identify each letter, memorandum, tape, note or other record related to each conversation, correspondence, or other communication with such individual.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By



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