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RELATED CORRESPONDENCE

DOCKETED
USNRC

January 14, 2000

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
PRIVATE FUEL STORAGE L.L.C.	)	Docket No. 72-22
	)	
(Private Fuel Storage Facility)	)	ASLBP No. 97-732-02-ISFSI

APPLICANT'S FOURTH SUPPLEMENTAL RESPONSE TO STATE'S FIRST REQUESTS FOR DISCOVERY

Applicant Private Fuel Storage L.L.C. ("Applicant" or "PFS") files this Fourth Supplemental Response to "State of Utah's First Set of Discovery Requests Directed to the Applicant ("State's First Discovery Requests"). The Applicant files this Supplemental Response pursuant to 10 C.F.R. § 2.740(e), to name additional witnesses it expects to call at hearing. The Applicant's original response to the State's First Discovery Requests noted that it would file such supplemental responses as it identified additional witnesses.[1]

I. GENERAL DISCOVERY REQUESTS

A. GENERAL INTERROGATORIES

GENERAL INTERROGATORY NO. 3. For each admitted Utah contention, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom PFS expects to call as a witness at the hearing. For purposes of answering this interrogatory, the educational and

[1] Applicant's Objections and Non-Proprietary Responses to State's First Requests for Discovery, dated April 21, 1999, at 17.

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scientific experience of expected witnesses may be provided by a resume of the person attached to the response.

APPLICANT'S RESPONSE: The Applicant supplements its response to the State's First Discovery Requests by identifying the following additional persons whom the Applicant expects to call as witnesses at the hearing with respect to the State's admitted contentions. The Applicant is still in the process of identifying witnesses that it expects to call at the hearings and will supplement this response in accordance with 10 C.F.R. § 2.740(e).

Utah Security C – Timely LLEA Response

Name and Address:	Frank Scharmann Tooele County Sheriff 47 South Main Tooele, Utah 84074
Profession:	Law Enforcement Officer
Employer:	Tooele County
Professional Expertise:	Law enforcement
Educational, Scientific Experience, and Professional Qualifications:	See attached resume
Publications in the last ten years:	To be provided later
Testifying experience as expert in last four years:	To be provided later
Subject matter of testimony:	Timely response of the Tooele County Sheriff's Office to unauthorized activities at the PFSF.
Documents reviewed and/or relied upon:	The documents reviewed and relied upon by Sheriff Scharmann will include the PFS License Application and responses to RAIs. In addition, Sheriff Scharmann may review and rely upon documents produced by the State as well as any new information that may come into PFS's possession.

Utah H – Inadequate Thermal Design

Name and Address:	Dr. Krishna P. Singh Holtec International 555 Lincoln Drive West Marlton, NJ 08053
Profession:	Executive and Mechanical Engineer
Employer:	Holtec International
Professional Expertise:	See attached resume
Educational, Scientific Experience, and Professional Qualifications:	See attached resume
Publications in the last ten years:	See attached resume
Testifying experience as expert in last four years:	Expert witness in fall 1995 trial between owners of the South Texas Project and Westinghouse concerning the South Texas steam generators and was subsequently deposed in 1996 in litigation involving Pacific Northwest laboratories.
Subject matter of testimony:	Dr. Singh will testify to the ability of the HI-STORM 100 cask storage system to withstand the temperatures at the PFSF site.
Documents reviewed and/or relied upon:	Dr. Singh will rely on the Topical Safety Analysis Report for the HI-STORM 100 and materials and analyses therein. In addition, Dr. Singh may rely on the FSF SAR and the Holtec EHT model performed for PFS as well as documents produced by the State and other documents that may come into PFS's possession.

GENERAL INTERROGATORY NO. 4. For each admitted Utah contention, identify the qualifications of each expert witness whom PFS expects to call at the

hearing, including but not limited to a list of all publications authored by the witness within the preceding ten years and a listing of any other cases in which the witness has testified as an expert at a trial, hearing or by deposition within the preceding four years.

APPLICANT'S RESPONSE: See Response to General Interrogatory 3 above. The Applicant is still in the process of identifying expert witnesses that it expects to call at the hearings and will supplement this response in accordance with 10 C.F.R. § 2.740(e).

GENERAL INTERROGATORY NO. 5. For each admitted Utah contention, describe the subject matter on which each of the witnesses is expected to testify at the hearing, describe the facts and opinions to which each witness is expected to testify, including a summary of the grounds for each opinion, and identify the documents (including all pertinent pages or parts thereof), data or other information which each witness has reviewed and considered, or is expected to consider or to rely on for his or her testimony.

APPLICANT'S RESPONSE. See Applicant's Response to General Interrogatory No. 3 above. Pursuant to subsequent discussion and agreement with counsel for the State of Utah, Applicant will identify and/or provide copies of documents relied upon, or expected to be relied upon, by Applicant's experts.

Respectfully submitted,

Jay E. Silberg
Ernest L. Blake, Jr.
Paul A. Gaukler
SHAW PITTMAN
2300 N Street, N.W.
Washington, DC 20037
(202) 663-8000
Counsel for Private Fuel Storage L.L.C.

Dated: January 14, 2000

January 14, 2000

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
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PRIVATE FUEL STORAGE L.L.C.	)	Docket No. 72-22
	)	
(Private Fuel Storage Facility)	)	ASLBP No. 97-732-02-ISFSI

DECLARATION OF PAUL A. GAUKLER

Paul A. Gaukler states as follows under penalties of perjury:

1. I am with Shaw Pittman in Washington, D.C.

2. I am duly authorized to verify Applicant's Fourth Supplemental Response to State's First Requests for Discovery; specifically, those supplemental responses to General Interrogatory Nos. 3-5.

3. I certify that the statements in such responses are true and correct to the best of my personal knowledge and belief.

I declare under penalty and perjury that the foregoing is true and correct.

Executed on January 14, 2000.

Paul Gaukler

Paul A. Gaukler

RESUME OF FRANK SCHARMANN

Frank Scharmann

Experience:

Tooele County Sheriff, Tooele, UT

1995-Present **Sheriff**

Supervises department personnel, all arrests, the County jail and prisoner's health in the County jail, transfer of prisoners, and the investigation of major criminal cases occurring in the County. Prepares & administers department budget. Coordinates department activities with other county departments and other law enforcement agencies.

Tooele City Police Department, Tooele, UT

1990–1995 **Assistant Chief of Police**

Duties include supervision of all departmental activities in the absence of the Chief. Supervise Patrol, Investigative and Administrative Divisions.

1984–1990 **Operations Commander**

Duties included overall supervision of patrol, investigative and administrative services functions.

1980-1984 **Lieutenant, Investigation Division**

Supervised all departmental criminal investigation activities of detective personnel.

1977-1980 **Investigations Sergeant**

Supervised all activities of detective personnel in division.

1975-1977 **Patrol Sergeant**

Supervised all routine patrol function activities of patrol shift personnel.

1972-1975 **Patrol Officer**

Responsible for all traditional field patrol officer activities.

Education/Training:

June 1999 Utah Peace Officer's Standards Training – Specialized school 7 Habits of Highly Effective People

September 1999 Continuing Challenge, Nuclear, Biological & Chemical Agents, California Specialized Training Institute

Education/Training: (Continued)

December 1997	Graduate of Executive Management Forum, University of Utah
May 1996	Graduate of National Sheriff's Institute
July 1995	Utah Peace Officer's Standards & Training, Correctional Officer Authority
February 1995	Chemical Stockpile Emergency Preparedness Program (CSEPP) Training, Deseret Chemical Depot
October 1994	Certificate of Completion in Comprehensive Emergency Management Professional Development Capstone Course
April 1992	Certificate of Achievement, Emergency Management Institute, Emittsburg, Maryland
August 1991	Certificate of Completion, Comprehensive Emergency Management Series, State of Utah
March 1985	Graduate of the FBI National Academy, Quantico, Virginia
October 1978	Graduate of Gormac School of Polygraph, Arcadia, California

Special Skills/Training:

Extensive specialized training in homicide investigation, arson investigation, narcotics operations, hostage negotiations, sex crimes investigation, child abuse investigation, and emergency management operations.

RESUME OF DR. KRISHNA P. SINGH

RESUME

KRISHNA P. SINGH, Ph.D.
PRESIDENT & CEO

EDUCATION

University of Pennsylvania
Ph.D. in Mechanical Engineering (1972)

University of Pennsylvania
M.S. in Mechanical Engineering (1969)

B.I.T. Sindri, Ranchi University
B.S. In Mechanical Engineering (1967)

PROFESSIONAL EXPERIENCE

HOLTEC INTERNATIONAL
Marlton, New Jersey

1986 - Present President and CEO

JOSEPH OAT CORPORATION
Camden, New Jersey

1979 - 1986	Vice President of Engineering
1974 - 1979	Chief Engineer
1971 - 1974	Principal Engineer

R.I.T. ALLAHABAD
India

1967 - 1968	Assistant Professor of Applied Mechanics

LICENSES

Registered Professional Engineer - Pennsylvania (1974 - present)

Registered Professional Engineer - Michigan (1980 - present)

PROFESSIONAL MEMBERSHIPS/ACTIVITIES

Fellow of the ASME; Member ANS; Chairman, TEMA Vibration Committee (1979 - 1986); Chairman, PVP Committee Of the ASME, Nuclear Engineering Division (1988-92); Member, ASME O&M Committee (1991 to present); Member ASCE (1977-83), Member, Heat Exchange Institute (1976-86).

PATENTS

"Heat Exchanger for Withstanding Cycle Changes in Temperature" (with M. Holtz and A. Soler), Patent No. 4,207,944 (1980).

"Radioactive Fuel Cell Storage Rack" (with M. Holtz), U.S. Patent No. 4,382,060 (May, 1983).

BOOKS AND ARCHIVAL VOLUMES (authored or edited):

1. "Mechanical Design of Heat Exchangers and Pressure Vessel Components", (with A. I. Soler), Arcturus Publishers, Cherry Hill, New Jersey, 1100 pages, hardbound (1984).

2. "Theory and Practice of Heat Exchanger Design", Arcturus Publishers (c. 1995).

3. "Feedwater Heater Workshop Proceedings", with Tom Libs, EPRI 78-123 (1979).

4. "Feedwater Heater Technology: State-of-the-Art", EPRI - cs - 4155 (1985).

5. "Analytical Correlations of Fluid Drag of Fuel Drag of Fuel Assemblies in Fuel Rack Storage Locations", EPRI Project RP-2124.

6. "Thermal/Mechanical Heat Exchanger Design", ASME, PVP - Vol. 118 (1986).

7. "Time Dependent and Steady State Characterization of the CAES Recuperator", EPRI TR-104224 (July 1994).

8. "Pressure Vessels, Heat Exchangers and Piping", Proc. ASME, IEEE Joint Power Generation Conference, NE-14 (1994).

ACADEMIC ACTIVITIES

Chair, Advisory Committee On Mechanical Engineering and Mechanics, University of Pennsylvania (1993-)

Professor (Adjunct) in Mechanical Engineering and Mechanics, University of Pennsylvania (1986-92), Graduate and Undergraduate Courses in Heat Transfer Equipment

CONTINUING EDUCATION COURSES OFFERED ON HEAT EXCHANGE AND STEAM GENERATION

1. I.I.T. Bombay, One Week Course on Heat Exchanger Design (1979).

2. Duke Power Company, Charlotte, NC (1982, 1983, 1986, 1990) - In-house Course on Heat Exchanger Design and Testing.

3. National Italian Reactor Authority, Genoa, Italy - On Condensers, Steam Generators, and Moisture Separator Reheaters (1985).

4. Mississippi Power & Light Company, In-House Course on Moisture Separator Reheaters and Surface Condensers (1987).

5. Center for Professional Advancement (1988, New Brunswick, NJ; 1990, Caracas, Venezuela; 1991, Houston, Texas; 1992, Amsterdam, Holland).

CONSULTING

Consultant to Electric Power Research Institute (EPRI); Pressure Vessel Research Council (PVRC); Tubular Exchanger Manufacturers Association (TEMA); Department of Energy (DOE) (Idaho Operations); Department of Energy (DOE) (Chicago Operations); American Electric Power Corporation; Baltimore Gas and Electric; Carolina Power & Light; Commonwealth Edison Company; Detroit Edison Company; Duke Power Company; Entergy Operations; GPU Nuclear; Iowa Electric Light and Power; New York Power Authority; Niagara Mohawk Power Corporation; North Atlantic Energy Services; Northeast Utilities; Northeast Nuclear Energy; Pacific Gas and Electric Company; PECO Energy; Southern Nuclear Operating Company; Tennessee Valley Authority.

PUBLICATIONS

1. "A Method for Solving Ill-Posed Integral Equations of the First Kind", (with B. Paul), Computer Methods in Applied Mechanics and Engineering 2 (1973) 339-348.

2. "Numerical Solutions of Non-Hertzian Elastic Contact Problems", (with B. Paul), Journal of Applied Mechanics, Vol. 41, No. 2, 484-490, June, 1974.

3. "On the Inadequacy of Hertzian Solution of Two Dimensional Line Contact Problems", Journal of the Franklin Institute, Vol, 298, No. 2, 139-141 (1974).

4. "How to Locate Impingement Plates in Tubular Heat Exchangers", Hydrocarbon Processing, Vol. 10, 147-149 (1974).

5. "Stress Concentration in Crowned Rollers", (with B. Paul), Journal of Engineering for Industry, Trans. ASME, Vol. 97, Series B, No. 3, 990-994 (1975).

6. "Application of Spiral Wound Gaskets for Leak Tight Joints", Journal of Pressure Vessel Technology, Trans. ASME, Vol. 97, Series J, No. 1, 91-93 (1975).

7. "Contact Stresses for Multiply-Connected Regions - The Case of Pitted Spheres:, with B. Paul and W. S. Woodward, Proceedings of the IUTAM Symposium on Contact Stresses, August 1974, Holland, Delft University Press, 264-281, (1976).

8. "Design of Skirt-Mounted Supports:, Hydrocarbon Processing, Vol. 4, 199-203, April 1976.

9. "Predicting Flow Induced Vibration in U-Bend Regions of Heat Exchangers - An Engineering Solution". Journal of the Franklin Institute, Vol. 302, No. 2, 195-205, August 1976.

10. "A Method to Design Shell-side Pressure Drop Constrained Tubular Heat Exchangers", with Mr. Holtz, Journal of Engineering for Power, Trans. of the ASME, Vol. 99, No. 3 July 1977, pp 441-448.

11. "An Efficient Design Method for Obround Pressure Vessels and Their End Closures", International Journal of Pressure Vessel and Piping, Vol. 5, 1977, pp 309-320.

12. "Analysis of Vertically mounted Through-Tube Heat Exchangers", Journal of Engineering for Power, Trans. ASME, Vol. 100, No. 2, April, 1978, pp 380-390.

13. "Study of Bolted Joint Integrity and Inter-Tube-Pass Leakage in U-Tube Heat Exchangers: Part I - Analysis", Journal of Engineering for Power, Trans. ASME, Vol. 101, No. 1, pp 9-15 (1979).

14. "Study of bolted Joint Integrity and Inter-Tube-Pass Leakage in U-Tube Heat Exchangers, Part II - Applications", Journal of Engineering for Power, Trans. ASME, Vol. 101, No. 1, pp 16-22 (1979).

15. "On Thermal Expansion Induced Stresses in U-Bends of Shell-and-Tube Heat Exchangers", (with Maurice Holtz); Trans. ASME, Journal of Engineering for Power, Vol. 101, No. 4, October, 1979, pp. 634-639.

16. "Heat Transfer Characteristics of a Generalized Divided Flow Heat Exchanger", Proceedings of the Conference on Industrial Energy Conservation Technology, Houston, Texas, pp 88-97 (1979).

17. "An Approximate Analysis of Foundation Stresses in Horizontal Pressure Vessels", (with Vincent Luk), Paper No. 79-NE-1, Trans. ASME, Journal of Engineering for Power, Vol. 102, No. 3, pp 555-557, July, 1980.

18. "Generalization of the Split Flow Heat Exchanger Geometry for Enhanced Heat Transfer", (with Michael Holtz), AIChe. Symposium Series 189, Vol. 75, pp 219-226 (1979).

19. "Analysis of Temperature Induced Stresses in the Body Bolts of Single Pass Heat Exchangers", ASME Winter Annual Meeting, Paper No. 79 QA/NE-7, New York, NY, 1979.

20. "Optimization of Two-Stage Evaporators for Minimizing Rad-Waste Entrainment", (with Maurice Holtz), Journal of Mechanical Design, Trans. of the ASME, Vol. 102, No. 4, pp 804-806 (1980).

21. "A Comparison of Thermal Performance of Two and Four Tube Pass Designs for Split Flow Shells", (with M. J. Holtz), Journal of Heat Transfer, Trans. of the ASME, Vol. 103, No. 1, pp 169-172, February, 1981.

22. "A Method for Maximizing Support Leg Stress in a Pressure Vessel Mounted on Four Legs Subject to Moment and Lateral Loadings". International Journal of Pressure Vessels and Piping, Vol. 9, No. 1, pp 11-25 (1981).

23. "Design, Stress Analysis and Operating Experience in Feedwater Heaters",, (with Tom Libs), Proceedings of the Conference on Industrial Energy Conservation Technology, Houston, pp 113-118 (1980).

24. "On the Necessary Criteria for Stream Symmetric Tubular Heat Exchanger Geometries", Heat Transfer Engineering, Vol. 3, No. 1 (1981).

25. "Some Fundamental Relationships for Tubular Heat Exchanger Thermal Performance", Trans. ASME, Journal of Heat Transfer, Vol. 103, pp 573-578 (1981).

26. "Transient Swelling of Liquid Level During Pool Boiling in an Emergency Condenser", (with J. P. Gupta). Letters in Heat and Mass Transfer, Vol. 8, No. 1, pp 25-33, Jan/Feb., 1981.

27. "An Approximate Method for Evaluating the Temperature Field in Tubesheet Ligaments Under Steady State Conditions", (with M. Holtz), Journal of Engineering for Power, Trans. ASME, Vol. 104, pp 895-900 (1982).

28. "Feasibility Study of A Multi-Purpose Computer Program to Optimize Power Cycles for Operative Plants", (with Y. Menuchin and N. Hirota), Proceedings of the Conference on Industrial Energy Conservation Technology, Houston, (1981).

29. "Design Parameters Affecting Bolt Load in Ring Type Gasketed Joints", (with A. I. Soler), Trans. ASME, Journal of Pressure Vessel Technology, Vol 105, pp 11-13 (1983).

30. "A Design Concept for Minimizing Tubesheet Stress and Tubejoint Load in Fixed Tubesheet Heat Exchangers", (with A. I. Soler), Trans. ASME (C. 1982).

31. "Dynamic Coupling in a Closely Spaced Two-Body System Vibrating in Liquid Medium: The Case of Fuel Racks", (with A. I. Soler), Proceedings of the Third International Conference on "Vibration in Nuclear Plant", Keswick, England, May, 1982, pp. 815-834.

32. "Effect of Nonuniform Inlet Air Flow on Air Cooled Heat Exchanger Performance", (with A. I. Soler and Lee Ng), Proceedings of the Joint ASME-JSME Heat Transfer Conference, 1983, pp. 537-542.

33. "Seismic Response of Free Standing Fuel Rack Constructions to 3-D Motions", (with A. I. Soler), Nuclear Engineering and Design, Vol. 80, (1984), pp. 315-329.

34. "A Method for Computing Maximum Water Temperature in a Fuel Pool Containing Spent Nuclear Fuel", Heat Transfer Engineering, Hemisphere, Dec. (1986).

35. "On Minimization of Radwaste Carry-Over in a N-stage Evaporator", (with Maurice Holtz and Vincent Luk), Heat Transfer Engineering, pp. 68-73, Vol. 5, No. 1-1 (1984).

36. "Feedwater Heater Procurement Guidelines - Some New Performance Criteria", Symposium on State-of-the-art Feedwater Heater Technology, EPRI (c. 1984).

37. "Method for Quantifying Heat Duty Derating due to Inter-Pass Leakage in Bolted Flat Cover Heat Exchangers", Heat Transfer Engineering, pp. 19-23, Vol. 4, No. 3-4 (1983).

38. "On Some Performance Parameters for Closed Feedwater Heaters, Journal of Pressure Vessel Technology, Trans. ASME (1987).

39. "A Design Procedure for Evaluating the Tube Axial Load Due to Thermal Effects in Multi-Pass Fixed Tubesheet Heat Exchangers", (with A. I. Soler), Journal of Pressure Vessel Technology, Trans. ASME (1987).

40. "An Elastic-Plastic Analysis of the Integral Tubesheet in U-Tube Heat Exchangers - Towards an ASME Code Oriented Approach", Int. Journal of Vessel and Piping (c. 1987).

41. "Feedwater Heaters", Heat Transfer Equipment Design, R. Shal et. al (editor), Hemisphere (c. 1988).

42. "Surface Condensers", Heat Transfer Equipment Design, R. Shal et. al (editor), Hemisphere (c. 1988).

43. "FLow Induced Vibration", Heat Transfer Equipment Design, R. Shal et. al (editor), Hemisphere (c. 1988).

44. "Mechanical Design of Heat Exchangers", Heat Transfer Equipment Design, R. Shal et. al (editor), Hemisphere (c. 1988).

45. "A Rational Method for Analyzing Expansion Joints":, (with A. Soler), ASME, Journal of Pressure Vessel Technology (c. 1988).

46. "An Analysis of the Improvement in the Thermal Performance of Surface Condenser Equipped with Tweener Supports", ASME Joint Power Generation Conference, Miami (Oct. 1987).

47. "Pressure Vessels - Design & Operation", Chemical Engineering, pp 62-70, Chemical Engineering, July 1990, McGraw Hill, N.Y.

48. "Spent Fuel Storage Options: A Critical Appraisal", Power Generation Technology, pp 137-140, Sterling Publications, U.K. (1990-91).

49. "Design Strength of Primary Structural Welds in Free-Standing Structures", with A.I. Soler and S. Bhattacharya, Journal of Pressure Vessel Technology, Trans. ASME (c' 1991).

50. "Seismic Qualification of Free-Standing Nuclear Fuel Storage Modules - The Chin Shan Experience", Nuclear Engineering International, U.K. (March, 1991).

51. "Transient Response of Large Inertia Cross Flow Heat Exchangers", with Y. Wang, A.I. Soler and K. Iulianetti, ASME 91-JPGC-NE-27 (1991).

52. "Some Results from Simultaneous Seismic Simulations of All Racks in a Fuel Pool", with A.I. I. Soler, INNM Spent Fuel Management Seminar X, Washington, D.C., January, 1993.

53. "A Case for Wet Storage", INNM Spent Fuel Management Seminar X, Washington, D.C., January, 1993.

54. "Application of Transient Analysis Methodology to Heat Exchanger Performance Testing" with I. Rampall and Benjamin H. Scott, ASME Joint Power Generation Conference, October, 1994.

55. "Predicting Thermal Performance of Heat Exchangers Using In-Situ Testing and Statistical Correlation", with K. Iulianetti and Benjamin H. Scott, ASME Joint Power Generation Conference (1994).

56. "Shellside Boiling in Narrow Crevices", with I. Rampall (to be submitted for publication, Heat Transfer Engineering (ca. 1996)).

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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Before the Commission

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(Private Fuel Storage Facility)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's Fourth Supplemental Response to State's First Requests for Discovery, Declaration of Paul Gaukler, and the attached resumes were served on the persons listed below (unless otherwise noted) by e-mail with conforming copies by U.S. mail, first class, postage prepaid, this 14th day of January 2000.

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Dr. Peter S. Lam
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* Susan F. Shankman
Deputy Director, Licensing & Inspection
Directorate, Spent Fuel Project Office
Office of Nuclear Material Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attention: Rulemakings and Adjudications Staff
e-mail: hearingdocket@nrc.gov
(Original and two copies)

* Adjudicatory File
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Assistant Attorney General
Utah Attorney General's Office
160 East 300 South, 5th Floor
P.O. Box 140873
Salt Lake City, Utah 84114-0873
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Confederated Tribes of the Goshute Reservation and David Pete
1385 Yale Avenue
Salt Lake City, Utah 84105
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Land and Water Fund of the Rockies
2056 East 3300 South, Suite 1
Salt Lake City, UT 84109
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Diane Curran, Esq.
Harmon, Curran, Spielberg & Eisenberg, L.L.P.
1726 M Street, N.W., Suite 600
Washington, D.C. 20036
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Danny Quintana, Esq.
Skull Valley Band of Goshute Indians
Danny Quintana & Associates, P.C.
68 South Main Street, Suite 600
Salt Lake City, Utah 84101
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Richard E. Condit, Esq.
Land and Water Fund of the Rockies
2260 Baseline Road, Suite 200
Boulder, CO 80302

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Paul Gaukler

Paul A. Gaukler