

December 29, 1997

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|----------------------------|---|------------------------|
| In the Matter of |) | |
| |) | |
| PRIVATE FUEL STORAGE, LLC |) | Docket No. 72-22-ISFSI |
| |) | |
| (Independent Spent |) | |
| Fuel Storage Installation) |) | |

**FURTHER SUPPLEMENTAL MEMORANDUM IN SUPPORT OF THE PETITION OF
THE CONFEDERATED TRIBES OF THE GOSHUTE RESERVATION
AND DAVID PETE TO INTERVENE AND FOR A HEARING**

In response to the supplemental memorandum and declarations submitted by the Goshute Tribe, Applicant in turn submitted a declaration by Arlene Walsh. That declaration and the memorandum failed to fully reflect the facts, which are supplemented by the attached second supplemental declaration of Chrissandra Reed.

Ms. Reed notes the following points: (1) she herself visits the Skull Valley Reservation from 8 to 10 times per year, not just once a year as asserted by Ms. Walsh; and (2) Ms. Reed is Michaela's legal guardian.

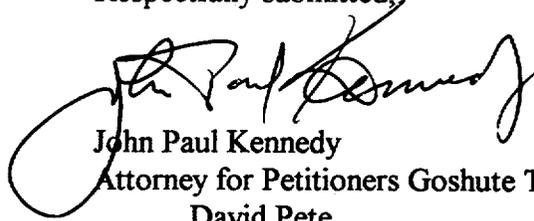
The Applicant has not denied that Michaela has been frequently present on the Skull Valley Reservation or that Michaela is a member of the Goshute Tribe.

Conclusion

Based upon the foregoing and the materials previously submitted, it is respectfully submitted that the Petition of the Goshute Tribe and David Pete to intervene in this matter should be granted.

Dated: December 29, 1997.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Paul Kennedy". The signature is written in a cursive style with a large initial "J".

John Paul Kennedy
Attorney for Petitioners Goshute Tribe and
David Pete

Certificate of Service

I hereby certify that copies of the above Further Supplemental Memorandum and the second supplemental declaration of Chrissandra Reed were served upon the persons indicated below in the manner stated on the date stated:

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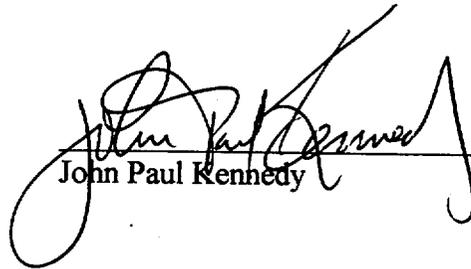
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Dated: December 29, 1997.


John Paul Kennedy

December 29, 1997

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SECOND SUPPLEMENTAL DECLARATION OF CHRISSANDRA M. REED IN SUPPORT
OF THE PETITION OF THE CONFEDERATED TRIBES OF THE GOSHUTE
RESERVATION TO INTERVENE

CHRISSANDRA M. REED, hereby declares under penalty of perjury:

1. She is an enrolled member of the Confederated Tribes of the Goshute Reservation (herein the Goshute Tribe) and currently serves as a member of the Tribal Business Council, which is the governing body of said Indian Tribe. She has previously submitted a declaration in support of the Petition of the Confederated Tribes of the Goshute Reservation to Intervene in this matter.
2. With respect to her three-year old granddaughter, Michaela, Declarant is the legal guardian of that granddaughter. Michaela resides on a full-time basis with Declarant except for times when she is under the care of Declarant's cousins on the Skull Valley Reservation.
3. As noted, Michaela is an enrolled member of the Goshute Tribe.

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4. The duration of such stays on the Skull Valley Reservation by Michaela are from one night to periods of up to two weeks. During her stays on the Skull Valley Reservation, Michaela resides in the home of her cousins and plays with her cousins and has gone horse-back riding there on the Skull Valley Reservation. Also, during such stays, she drinks local water and eats the food prepared and served by her cousins, which food includes natural foods gathered in the Skull Valley area.
 5. Declarant usually drops off her granddaughter at the I-80 truck stop (Rowley Junction) through which junction Applicant proposes to tranship nuclear waste.
 6. Declarant picks up her grandchild either at Salt Lake City or at the Skull Valley Reservation. About one-fourth of the pick-ups are on the Skull Valley Reservation. Only occasionally does she pick up her grandchild at the truck stop.
 7. On the average, Declarant visits the Skull Valley Reservation about 8-10 times each year.
- I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 29, 1997.


Chrissandra M. Reed