

UNITED STATES OF AMERICA
BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PRIVATE FUEL STORAGE, L.L.C.)
 (Independent Spent Fuel)
 Storage Installation))

Docket No. 72-22-ISFSI

January 16, 1998

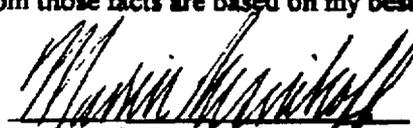
REPLY DECLARATION OF DR. MARVIN RESNIKOFF

I, Dr. Marvin Resnikoff, declare under penalty of perjury that:

1. I am the Senior Associate at Radioactive Waste Management Associates, a private consulting firm based in New York City. On November 20, 1997, I prepared a declaration which was submitted to the Licensing Board by the State of Utah in support of its contentions regarding Private Fuel Storage, L.L.C.'s proposed Independent Fuel Storage Installation. A statement of my qualifications is attached to that declaration.

2. I am familiar with Private fuel Storage's ("PFS's") license application and Safety Analysis Report in this proceeding, as well as the nonproprietary versions of applications for the storage and transportation casks PFS plans to use. I am also familiar with NRC regulations, guidance documents, and environmental studies relating to the transportation, storage, and disposal of spent nuclear power plant fuel, and with NRC decommissioning requirements.

3. I assisted in the preparation of, and have reviewed, the State of Utah's Reply to PFS's and NRC Staff's Responses to Utah Contentions A through DD, regarding failure to comply with NRC dose limits; inadequate facilitation of decommissioning; inadequate thermal design; inadequate inspection and maintenance safety components, such as canisters and cladding; inadequate training; inadequate quality assurance program; inadequate consideration of credible accidents, lack of a procedure for verifying presence of helium in canisters; and failure to consider impacts of onsite storage and transportation of spent nuclear fuel. The technical facts presented in the State's Reply regarding those contentions are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.


 Dr. Marvin Resnikoff