



# Atlantic Legal Foundation, Inc.

*Advocating traditional American values in the courts*

205 EAST 42ND STREET, NINTH FLOOR  
NEW YORK, NEW YORK 10017  
(212) 573-1960  
FAX (212) 573-1959

P.O. BOX 60483  
HARRISBURG, PENNSYLVANIA 17106  
(717) 671-5966  
FAX (717) 671-5967

February 10, 1998

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Attention: Rulemakings and  
Adjudications Staff

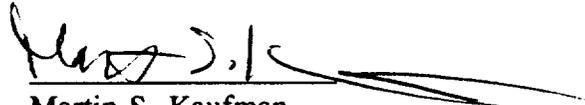
In the matter of  
*Private Fuel Storage LLC*  
NRC Docket No. 72-22 ISFSI  
ASLBP No. 97-732-02 ISFSI

Dear Secretary:

On behalf of the Scientists for Secure Waste Storage, I enclose an original and two copies of (1) my Notice of Appearance on Behalf of Scientists for Secure Waste Storage, and (2) Declaration of Interest and Appointment of Representative completed by Robert J. Hoffman, and (3) Certificate of Service.

Documents numbered (1) and (2) above have also been served by e-mail and regular mail today on the Board and Counsel for the other participants.

Very truly yours,

  
Martin S. Kaufman

MSK:jbd  
Enclosures

---

In the Matter of

PRIVATE FUEL STORAGE, L.L.C.

(Independent Spent Fuel  
Storage Installation)

---

Docket No. 72-22-ISFSI

ASLBP No. 97-732-02-ISFSI

February 9, 1998

**NOTICE OF APPEARANCE  
ON BEHALF OF SCIENTISTS  
FOR SECURE WASTE STORAGE**

The undersigned, Martin S. Kaufman, Esq., makes this appearance in the above matter on behalf of the Scientists for Secure Waste Storage pursuant to 10 CFR §2.713(c).

1. I, Martin S. Kaufman, Esq., am Senior Vice President and General Counsel of the Atlantic Legal Foundation, 205 E. 42nd St., New York, N.Y. 10017, telephone number (212) 573-1960, telefax number (212) 573-1959, E-Mail address: mskaufman@yahoo.com.

2. I am representing the group of scientists who have intervened in the above action as the Scientists for Secure Waste Storage ("SSWS"). Their address is c/o Professor Richard Wilson, Department of Physics, Harvard University, Cambridge, MA 02138.

3. I am an attorney at law and am admitted to practice in New York State, before the United States Supreme Court, before the United States Courts of Appeals for the Second, Third, Fourth and Fifth Circuits, and in several United States District Courts and have been duly authorized by SSWS to act as their legal advisor in the above matter. The Atlantic Legal Foundation is itself not an intervenor in the above matter.

  
Martin S. Kaufman, Esq.

Dated: New York, New York  
February 10, 1998

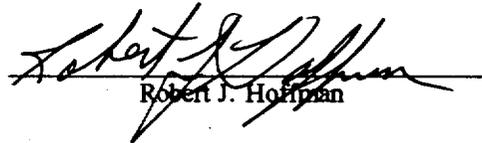
IN THE MATTER OF:  
PRIVATE FUEL STORAGE LLC  
NRC DOCKET NO. 7222-ISFSI  
ASLBP NO. 97-732-02 ISFSI

Declaration of Interest and Appointment of Representative

I, ROBERT J. HOFFMAN, hereby declare under penalty of perjury and pursuant to 28 U.S.C. Section 1746, that the following statements are true and correct to the best of my knowledge, information and belief. I submit this Declaration in support of the Petition for Intervention of Scientists for Secure Waste Storage before the Nuclear Licensing Board of the Nuclear Regulatory Commission, and shows as follows:

1. I am a Radiation Safety Consultant, and I am a former Chairman of the Radiation Control Board of The State of Utah.
2. I reside at 2291 Four Woods Circle, Salt Lake City, Utah 84109, and work in Salt Lake City.
3. As a resident of the State of Utah, living and working in proximity to the site of the proposed spent fuel storage facility, I have a personal, as well as a professional, interest in the safety and other science issues regarding the storage facility.
4. I am a member of Scientists for Secure Waste Storage, which seeks to intervene in this docket, and a co-petitioner.
5. I appoint Professor Richard Wilson as my representative in this matter.

Dated: Salt Lake City, Utah  
February 3, 1998

  
Robert J. Hoffman

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 ISFSI  
 )  
(Private Fuel Storage Facility) ) ASLBP No. 97-732-02-ISFSI

CERTIFICATE OF SERVICE

I hereby certify that copies of the "Notice of Appearance on Behalf of Scientists for Secure Waste Storage" and "Declaration of Interest and Appointment of Representative" 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 10th day of February 1998.

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attention: Rulemakings and  
Adjudications Staff

G. Paul Bollwerk, III, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dr. Peter S. Lam  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dr. Jerry R. Kline  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

\*Adjudicatory File  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Jay E. Silberg, Esq.  
Shaw, Pittman, Potts & Trowbridge  
2300 N. Street, N.W.  
Washington, D.C. 20037

Catherine L. Marco, Esq.  
Sherwin E. Turk, Esq.  
Office of the General Counsel  
Mail Stop O-15 B18  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Denise Chancellor, Esq.  
Assistant Attorney General  
Utah Attorney General's Office  
160 East 300 South, 5th Floor  
P.O. Box 140873  
Salt Lake City, Utah 84114-0873

John Paul Kennedy, Sr., Esq.  
Confederated Tribes of the  
Goshute Reservation and  
David Pete  
1385 Yale Avenue  
Salt Lake City, Utah 84105

Clayton J. Parr, Esq.  
Castle Rock, et al.  
Parr, Waddoups, Brown, Gee  
& Loveless  
185 S. State Street, Suite 1300  
P.O. Box 11019  
Salt Lake City, Utah 84147-0019

Danny Quintana, Esq.  
Skull Valley Band of Goshute Indians  
Danny Quintana & Associates, P.C.  
50 West Broadway, Fourth Floor  
Salt Lake City, Utah 84101

Jean Belille, Esq.  
Ohngo Gaudadeh Devia  
Land and Water Fund of the Rockies  
2260 Baseline Road, Suite 200  
Boulder, Colorado 80302

Diane Curran, Esq.  
2001 S Street, N.W.  
Washington, D.C. 20009

Mr. Charles J. Haughney  
Acting Director, Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

  
MARTIN S. KAUFMAN, ESQ.

\* By U.S. mail only