

November 23, 1998

Administrative Judge G. Paul Bollwerk, Chairman  
Administrative Judge Jerry R. Kline  
Administrative Judge Peter S. Lam  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: PFS, Docket No. 72-22  
ASLBP No. 97-732-02-ISFSI

Dear Chairman Bollwerk and Judges Kline and Lam:

In your order ruling on contentions, LBP-98-7, dated April 22, 1998, you indicated that Castle Rock Land and Livestock, L.C. and Skull Valley Co., Ltd. (collectively, "Castle Rock") should take the lead with respect to the range of alternatives contention, Castle Rock 13, consolidated with State of Utah's Contention AA. I have discussed the matter with the principals at Castle Rock and counsel for the State of Utah and, subject to your approval, request on behalf of Castle Rock that the State of Utah take over as lead party on this contention.

Please advise whether this change in lead party for the range of alternatives contention is acceptable.

Yours truly,



Bryan T. Allen