

STATE OF UTAH  
OFFICE OF THE ATTORNEY GENERAL



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REED RICHARDS  
Chief Deputy Attorney General

PALMER DEPAULIS  
Director of Public Policy & Communications

June 18, 1999

Emile L. Julian, Assistant for  
Rulemakings and Adjudications  
Rulemakings and Adjudications Staff  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike, One White Flint North  
Mail Stop: O16G15  
Washington, D.C. 20555

Re: In the Matter of Private Fuel Storage, LLC, Docket 72-22

Dear Mr. Julian;

Enclosed are original signed documents (plus two copies of each) which had not been available at the time certain State's pleadings were filed. They are:

1. Declaration of David Larsen, dated April 29, 1999, the faxed version of which was filed with the State of Utah's Amended Responses to Applicant's First Set of Formal Discovery Requests, dated April 29, 1999;
2. Declaration of Dr. Marvin Resnikoff, the faxed version of which was filed with the State of Utah's Motion to Compel Applicant to Respond to State's First Set of Discovery Requests, dated April 30, 1999. There are two Declarations, one to file with the proprietary version of the pleading and one to file with the redacted version;
3. Signature page with Brent Bradford's signature, the faxed version of which was filed with the State of Utah's Second Set of Discovery Requests Directed to the Applicant, dated May 13, 1999. There are two signature pages, one to file with the proprietary version of the pleading and one to file with the redacted version;

June 18, 1999 letter to Emile L. Julian, page 2

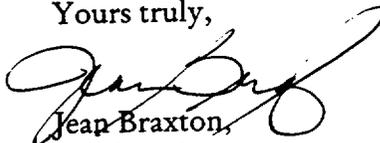
4. Signature page with Brent Bradford's signature, the faxed version of which was filed with the State of Utah's Third Set of Discovery Requests Directed to the Applicant, dated May 18, 1999. There are two signature pages, one to file with the proprietary version of the pleading and one to file with the redacted version;
5. Declaration of Neil Taylor, the faxed version of which was filed with the State of Utah's Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, dated June 4, 1999; and
6. Declarations of David B. Cole, David Larsen, and Bronson W. Hawley, who were not available to sign their Declarations at the time the State of Utah's Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, dated June 4, 1999, was filed.

Please replace the faxed version of these documents with the enclosed original signed documents, and add the Declarations of David B. Cole, David Larsen, and Bronson W. Hawley to the State of Utah's Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, dated June 4, 1999.

Please contact me with any questions at (801) 366-0287.

Thank you.

Yours truly,

  
Jean Braxton,  
Legal Assistant

Enclosures: as stated  
cc: Service List, with documents # 6,  
without documents # 1-5.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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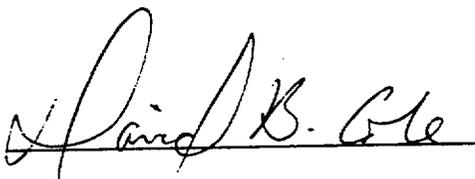
|                           |   |                           |
|---------------------------|---|---------------------------|
| In the Matter of:         | ) | Docket No. 72-22-ISFSI    |
| PRIVATE FUEL STORAGE, LLC | ) | ASLBP No. 97-732-02-ISFSI |
| (Independent Spent Fuel   | ) |                           |
| Storage Installation)     | ) | June 7, 1999              |

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**DECLARATION OF DAVID B. COLE**

I, David B. Cole, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's June 4, 1999 Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, relating to Utah Contention M (probable maximum flood), are true and correct to the best of my knowledge, information and belief.

Executed this 7th day of June, 1999.

By: 

David B. Cole  
Senior Engineer  
Utah Division of Water Resources  
Utah Department of Natural Resources

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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|                           | ) |                           |
| PRIVATE FUEL STORAGE, LLC | ) | ASLBP No. 97-732-02-ISFSI |
| (Independent Spent Fuel   | ) |                           |
| Storage Installation)     | ) | June 4, 1999              |

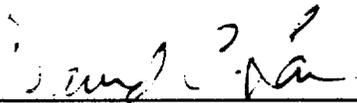
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**DECLARATION OF DAVID C. LARSEN**

I, David C. Larsen, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's June 4, 1999 Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, relating to Utah Contention K (Inadequate Consideration of Credible Accidents, specifically Dugway Proving Ground), are true and correct to the best of my knowledge, information and belief.

Executed this 4th day of June, 1999.

By:



David C. Larsen  
Environmental Scientist, Geologist  
Division of Solid and Hazardous Waste  
Utah Department of Environmental Quality

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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| In the Matter of:         | ) | Docket No. 72-22-ISFSI    |
|                           | ) |                           |
| PRIVATE FUEL STORAGE, LLC | ) | ASLBP No. 97-732-02-ISFSI |
| (Independent Spent Fuel   | ) |                           |
| Storage Installation)     | ) | June 4, 1999              |

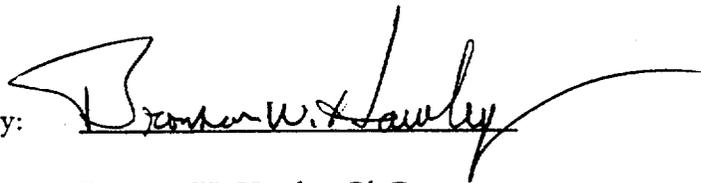
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**DECLARATION OF BRONSON W. HAWLEY**

I, Bronson W. Hawley, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's June 4, 1999 Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, relating to Utah Contention K (Inadequate Consideration of Credible Accidents, specifically Utah Test and Training Range, and Hill Air Force Base), are true and correct to the best of my knowledge, information and belief.

Executed this 10th day of June, 1999.

By:



Bronson W. Hawley, Ph.D.  
Environmental Scientist  
Division of Solid and Hazardous Waste  
Utah Department of Environmental Quality