

STATE OF UTAH
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April 22, 1999

Via Electronic and First Class Mail

Messrs Ernie Blake and Paul Gaukler
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington DC 30037-1128

re: State's Response to Applicant's First Set of Discovery Requests
and PFS's Proposed Motion to Compel

Dear Paul and Ernie:

I refer to the e-mail letter I received from you yesterday and our various conversations of the same date about the above subject.

First, I confirm that the State is in the process of obtaining sworn declarations from all persons who provided substantive assistance to the State in answering your discovery request. Such declarations will be filed with the NRC and served on all parties once they have been obtained.

Second, I also confirm that the State has provided you with all non-privileged documents in the State's possession and control. We are endeavoring to obtain other documents, not in the State's control, and will supplement our responses if and when we received such documents.

Third, the State has orally provided you with the names of witnesses for some of Group I contentions. Marvin Resnikoff will testify for Utah Contentions B, C, F/P, and G. David Cole will testify for Utah Contentions M and N. PFS has informally interviewed Dr. Resnikoff and Mr. Cole and has a copy of their resumes. We agreed that PFS would not depose State witnesses with respect to Group I contentions, with the exception of witnesses

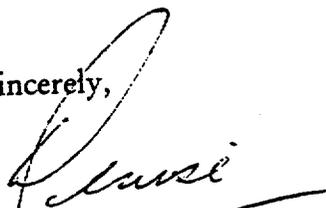
for Utah Contention K, until May 17, 1999 or some date later in May. PFS advised the State that it intends to depose General Mathews, David Larsen and Bronson Hawley with respect to Utah Contention K. The State is in the process of checking their availability for May 5, 6 and 7 or May 10, 11 and 12. We will need agree on the anticipated amount of time for each deposition and location of where they will take place.

Fourth, we discussed the State's answer "the document speaks for itself." The State will shortly amend those responses.

Finally, we have been unable to resolve the remaining issues before today's deadline for filing your Motion to Compel. We will need to see your motion before we can more fully address the remaining issues, such as the specificity of certain responses and "denied on information and belief" responses. We will continue to work with you on trying to resolve those issues.

On a different note, none of the Applicant's e-mail pleadings transmitted to the State are being sent to Connie Nakahara. Please add Ms. Nakahara to your electronic e-mail list of pleadings served on the State (cnakahar@state.ut.us). Within the last week or two, I sent an e-mail request to Liz Clark to add Connie to your e-mail service list but the Applicant's latest pleadings have not been sent by e-mail to Connie. Thank you.

Sincerely,



Denise Chancellor
Assistant Attorney General