

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	Docket No. 72-22-ISFSI
PRIVATE FUEL STORAGE, LLC)	ASLBP No. 97-732-02-ISFSI
(Independent Spent Fuel)	
Storage Installation))	April 28, 1999

**STATE OF UTAH'S UNOPPOSED REQUEST FOR EXTENSION
OF TIME TO FILE MOTION TO COMPEL**

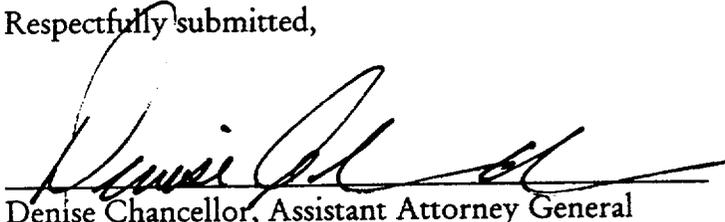
The State of Utah hereby requests an extension of time in which to file a motion to compel in response to Applicant's Objections and Responses to State's First Requests for Discovery (both proprietary and non-proprietary versions), which were filed on April 21, 1999. Pursuant to the Board's Order dated August 20, 1998, motions to compel must be filed within seven days of receiving discovery responses. The State has consulted with counsel for the Applicant, Private Fuel Storage, L.L.C. ("PFS"), who stated that PFS does not oppose the requested extension.

Because of the convergence of a number of obligations at the same time in this case, including responding to the Applicant's April 22, 1999, Motion to Compel (response due April 29, 1999), responding to Applicant's Motion for

Summary Disposition of Utah Contention C (April 21, 1999) (response due May 11, 1999), preparing for the April 29, 1999, NEPA scoping hearing on the Low Rail Spur, and preparing the State's own discovery requests, the State is unable to meet today's deadline for filing its motion to compel against PFS. The State therefore requests an extension of two days, until April 30, 1999.

DATED this 28th day of April, 1999.

Respectfully submitted,



Denise Chancellor, Assistant Attorney General
Fred G Nelson, Assistant Attorney General
Diane Curran, Special Assistant Attorney General
Connie Nakahara, Special Assistant Attorney General
Attorneys for State of Utah
Utah Attorney General's Office
160 East 300 South, 5th Floor, P.O. Box 140873
Salt Lake City, UT 84114-0873
Telephone: (801) 366-0286, Fax: (801) 366-0292

CERTIFICATE OF SERVICE

I hereby certify that copies of STATE OF UTAH'S UNOPPOSED REQUEST FOR EXTENSION OF TIME TO FILE MOTION TO COMPEL were served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class, this 28th day of April, 1999.

Rulemaking & Adjudication Staff
Secretary of the Commission
U. S. Nuclear Regulatory
Commission
Washington D.C. 20555
E-mail: hearingdocket@nrc.gov
(original and two copies)

G. Paul Bollwerk, III, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory
Commission
Washington, DC 20555
E-Mail: gpb@nrc.gov

Dr. Jerry R. Kline
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory
Commission
Washington, DC 20555
E-Mail: jrk2@nrc.gov

Dr. Peter S. Lam
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555
E-Mail: psl@nrc.gov

Sherwin E. Turk, Esq.
Catherine L. Marco, Esq.
Office of the General Counsel
Mail Stop - 0-15 B18
U.S. Nuclear Regulatory Commission
Washington, DC 20555
E-Mail: set@nrc.gov
E-Mail: clm@nrc.gov
E-Mail: pfscase@nrc.gov

Jay E. Silberg, Esq.
Ernest L. Blake, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N. W.
Washington, DC 20037-8007
E-Mail: Jay_Silberg@shawpittman.com
E-Mail: ernest_blake@shawpittman.com
E-Mail: paul_gaukler@shawpittman.com

John Paul Kennedy, Sr., Esq.
1385 Yale Avenue
Salt Lake City, Utah 84105
E-Mail: john@kennedys.org

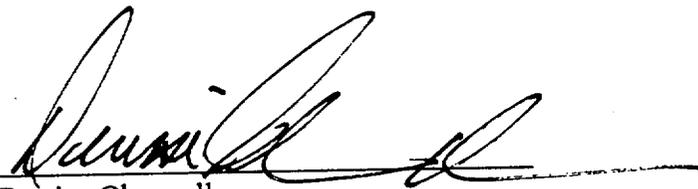
Richard E. Condit, Esq.
Land and Water Fund of the
Rockies
2260 Baseline Road, Suite 200
Boulder, Colorado 80302
E-Mail: rcondit@lawfund.org

Joro Walker, Esq.
Land and Water Fund of the
Rockies
165 South Main, Suite 1
Salt Lake City, Utah 84111
E-Mail: joro61@inconnect.com

Danny Quintana, Esq.
Danny Quintana & Associates, P.C.
50 West Broadway, Fourth Floor
Salt Lake City, Utah 84101
E-Mail: quintana@xmission.com

James M. Cutchin
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
E-Mail: jmc3@nrc.gov
(*electronic copy only*)

Office of the Commission Appellate
Adjudication
Mail Stop: 16-G-15 OWFN
U. S. Nuclear Regulatory Commission
Washington, DC 20555
(*United States mail only*)



Denise Chancellor
Assistant Attorney General
State of Utah