

STATE OF UTAH  
OFFICE OF THE ATTORNEY GENERAL



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June 30, 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 Dr. Marvin Resnikoff, dated June 22, 1999, the faxed version of which was filed with the State of Utah's Request for Admission of Late-Filed Amended Utah Contention C, dated June 23, 1999; and
2. Declaration of Dr. Marvin Resnikoff, dated June 24, 1999, the faxed version of which was filed with the State of Utah's Objections and Responses to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 28, 1999.

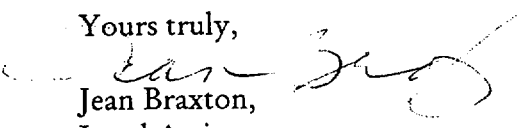
Please replace the faxed version of these documents with the enclosed original signed documents into the corresponding pleadings as listed above.

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

Thank you.

Enclosures: as stated  
cc: Service List without enclosures

Yours truly,

  
Jean Braxton,  
Legal Assistant

UNITED STATES OF AMERICA  
BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PRIVATE FUEL STORAGE, L.L.C.  
(Independent Spent Fuel  
Storage Installation)

Docket No. 72-22-ISFSI

June 22, 1999

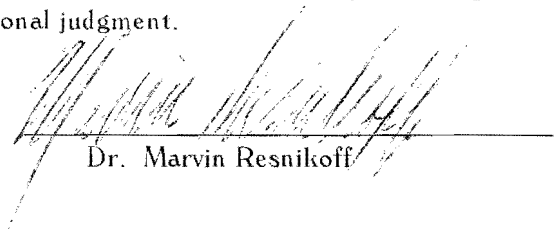
DECLARATION OF DR. MARVIN RESNIKOFF IN SUPPORT OF  
STATE OF UTAH'S AMENDED CONTENTION C

I, Dr. Marvin Resnikoff, declare under penalty of perjury that:

1. I am the Senior Associate at Radioactive Waste Management Associates, a private consulting firm based in New York City. On November 20, 1997 and January 16, 1998, I prepared declarations which were submitted to the Licensing Board by the State of Utah in support of its contentions regarding Private Fuel Storage, L.L.C.'s proposed Independent Fuel Storage Installation. A statement of my qualifications was attached to November 1997 declaration.

2. I am familiar with Private fuel Storage's ("PFS's") license application and Safety Analysis Report in this proceeding, as well as the applications for the storage and transportation casks PFS plans to use. I am also familiar with NRC regulations, guidance documents, and environmental studies relating to the transportation, storage, and isposal of spent nuclear power plant fuel, and with NRC decommissioning requirements.

3. I assisted in the preparation of the State of Utah's Amended Contention C. The technical facts presented in Amended Contention C are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.



Dr. Marvin Resnikoff

June 22, 1999

JUN 29 1999

ENVIRONMENT

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONBEFORE 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 24, 1999

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**DECLARATION OF DR. MARVIN RESNIKOFF**

I, Dr. Marvin Resnikoff, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed on June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to Utah Contentions H, U, and V; and with respect to Utah Contentions E and S, limited to worst case accident scenarios.

Dated this 24th day of June, 1999.

By: 

Marvin Resnikoff, PhD,  
Senior Associate  
Radioactive Waste Management Associates