

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

IN THE UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

\*\*\*

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

- - - - -x

In Matter of: : Docket No. 72-22  
PRIVATE FUEL STORAGE, L.L.C : ASLBP No.  
(Private Fuel Storage Facility) : 97-732-02-ISFI

- - - - -x

Washington, D.C.

Wednesday, May 19, 1999

Deposition of MARVIN RESNIKOFF, was called  
for examination by counsel, commenced pursuant to  
notice, at 10:10 a.m., at the offices of Shaw,  
Pittman, Potts & Trowbridge, 2300 N Street, NW,  
Washington, D.C., before Karen K. Brynteson,  
Registered Professional Reporter and Notary Public.

1           A     Yes.

2           Q     And what is your basis for trying to apply  
3     it to commercial as well?

4           A     Because it is my understanding that most  
5     accidents take place while during takeoffs and  
6     landings, and not during flights.  If I were to take  
7     into account flights, I would have to take into  
8     account all the flights in the country, not just  
9     those at Salt Lake City.

10           And I was using that kind of statistic, so  
11     I would focus more on the number of accidents that  
12     take place within a certain radius of an airport per  
13     year.  I would focus on that statistic because that  
14     seems to capture the truth of what is happening  
15     here.

16           Q     I have two questions based upon your last  
17     answer.  First of all, what statistics do you have  
18     with respect to radius, accidents within a 45 mile  
19     radius of an airport, beyond 45 miles?  Would that  
20     be beyond the radius that you would consider to be  
21     significant, more than 45 miles from the airport?

22           A     I don't know the answer to that question.