

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)	)	May 20, 1999

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**STATE OF UTAH'S THIRD SUPPLEMENTAL RESPONSE  
TO APPLICANT'S FIRST SET OF FORMAL DISCOVERY REQUESTS**

The State of Utah supplements its April 14, 1999, April 29, 1999, and May 12, 1999 responses to the Applicant's First Set of Formal Discovery Requests ("Applicant's Discovery Requests"). This response supplements the State's responses to General Interrogatory No. 3.

**GENERAL INTERROGATORY NO. 3.** For each admitted Utah contention, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom the State expects to call as a witness at the hearing. For purposes of answering this interrogatory, the educational and scientific experience of expected witnesses may be provided by a resume of the person attached to the response.

STATE'S SUPPLEMENTAL RESPONSE TO GENERAL  
INTERROGATORY NO. 3.

The following are additional witnesses the State expects to call at the hearing:

**Utah Contention K - Inadequate Consideration of Credible Accidents**

Donald Verbica, Jr., Section Manager  
Division of Solid and Hazardous Waste  
Utah Department of Environmental Quality  
288 North 1460 West  
Salt Lake City, Utah 84116

Martin Delmar Gray, Section Manager  
Division of Solid and Hazardous Waste  
Utah Department of Environmental Quality  
288 North 1460 West  
Salt Lake City, Utah 84116

Marvin Resnikoff, PhD, Senior Associate  
Radioactive Waste Management Associates  
526 West 26th Street, Room 517  
New York, NY 10001

**Utah Contention R - Emergency Plan**  
Gary Alan Wise, State Fire Marshal  
Utah Department of Public Safety  
5272 South College Drive, Suite 302  
Murray, Utah 84123-261

**Utah Contention Security-A, B, C - Safeguards**  
Mark Millett, Lieutenant  
Section 12/13  
Bureau IV, Motor Carrier Safety & Inspection Bureau  
Utah Highway Patrol  
5500 W. Amelia Earhart Drive  
Salt Lake City, Utah 84116

Attached is Donald Verbica's resume. Resumes for Martin D. Gray, Gary A.

Wise, and Mark Millett will be provided as soon as they are available. Dr. Marvin

Resnikoff's resume has already been provided in this proceeding.

DATED this 20<sup>th</sup> day of May, 1999.

Respectfully submitted,

STATE OF UTAH

A handwritten signature in black ink, appearing to read "Denise Chancellor", written over a horizontal line.

Denise Chancellor, Assistant Attorney General  
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**DONALD G. VERBICA**  
**Manager, Commercial\Federal Facility Section**  
**Utah Division of Solid and Hazardous Waste**  
**288 North 1460 West**  
**Salt Lake City, Utah 84114-4880**

**EDUCATION** Brigham Young University, Provo, Utah. Bachelor degree in Geology, 1982.

**EXPERIENCE**

Dec 1983 - present Utah Division of Solid and Hazardous Waste. Served in various positions. Currently serving as Section Manager for the Commercial\Federal Facility Section. The main functions of the Commercial/Federal Facility section are to perform permitting activities and to evaluate compliance for the commercial and selected federal facilities. When permit modifications are requested, the section evaluates them and determines if they are appropriate/complete or if they need revisions. Any construction is also evaluated to ensure that it was completed as required by the permit. Where deviation from the permit or rules are documented, appropriate enforcement responses are selected and implemented to ensure compliance.

CERTIFICATE OF SERVICE

I hereby certify that a copy of STATE OF UTAH'S THIRD SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF FORMAL DISCOVERY REQUESTS was served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class, this

20<sup>th</sup> day of May, 1999:

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