

July 7, 1999

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of)
)
PRIVATE FUEL STORAGE L.L.C.) Docket No. 72-22-ISFSI
)
(Private Fuel Storage Facility))

**APPLICANT’S SUPPLEMENTAL RESPONSE TO
OGD’S FIRST SET OF DISCOVERY REQUESTS**

Applicant Private Fuel Storage L.L.C. (“Applicant” or “PFS”) files this Supplemental Response to Ohngo Gaudedah Devia’s (“OGD”) First Set Of Discovery Requests Directed To The Applicant, pursuant to an agreement¹ reached between OGD and PFS concerning the discovery requests of both parties.

I. OGD’S DISCOVERY REQUEST

A. ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 3: Please provide the names, addresses, telephone numbers, facsimile numbers, and titles of each person, employee, agent, representative (including attorneys), consultant who evaluated potential sites/locations for the proposed PFS facility and who participated in any manner in the decision to choose the Skull Valley Reservation as the site for the proposed facility.

APPLICANT’S RESPONSE – The individuals listed below were involved in the evaluation of potential sites/locations and participated in the decision to chose the Skull Valley Reservation as the site for the proposed PFS facility. This information is provided according to the terms of the agreement reached between PFS and OGD with respect to OGD’s Motion to Compel. Under the terms of these agreement, PFS agreed to

¹ PFS’s understanding of the agreement was memorialized in the July 6, 1999 letter from Paul Gaukler, counsel for PFS, to Joro Walker, counsel for OGD.

answer this Interrogatory with the understanding that OGD will advise PFS four weeks in advance of its intent to depose any individual identified and that OGD, at that time, will also identify the general areas and topics that it proposes to cover in the deposition. The purpose of this four week period is to allow PFS to seek a protective order should it believe that the deposition topics are beyond the scope of the admitted contention.

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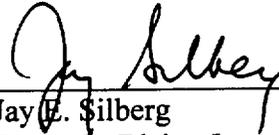
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Respectfully submitted,



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Dated: July 7, 1999

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

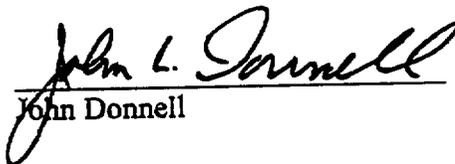
DECLARATION OF JOHN DONNELL

John Donnell states as follows under penalties of perjury:

1. I am the Project Director for Private Fuel Storage, L.L.C.
2. I am duly authorized to verify Applicant's Supplemental Response to OGD's First Set of Discovery Requests; specifically, the response to Interrogatory No. 3.
3. I certify that the statements and opinions in such responses are true and correct to the best of my personal knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 1999.



 John Donnell

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(Private Fuel Storage Facility))

CERTIFICATE OF SERVICE

I hereby certify that copies of the "Applicant's Supplemental Response to OGD'S First Set of Discovery Requests", dated July 7, 1999, and supporting Declaration from John Donnell were served on the persons listed below (unless otherwise noted) by e-mail, with exhibits thereto by facsimile, with conforming copies by U.S. Mail, first class, postage prepaid, this 7th day of July, 1999.

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Attention: Rulemakings and Adjudications
Staff
e-mail: hearingdocket@nrc.gov
(Original and two copies)

* Adjudicatory File
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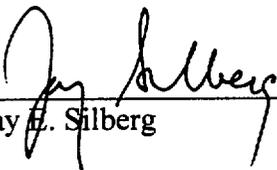
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* By Hand Delivery only


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