

May 13, 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

**APPLICANT'S FIRST SET OF DOCUMENT REQUESTS
TO INTERVENOR OGD**

Applicant Private Fuel Storage L.L.C. ("Applicant" or "PFS") hereby makes the following formal document requests of OGD.

General Definitions and Instructions

1. The term "document" means the complete original or a true, correct, and complete copy and any non-identical copies, whether different by reason of any notation or otherwise, of any written or graphic matter of any kind, no matter how produced, recorded, stored, or reproduced (including electronic, mechanical or electrical records or representation of any kind) including, but not limited to, any writing, letter, telegram, meeting minute or note, memorandum, statement, book, record, survey, map, study, handwritten note, working paper, chart, tabulation, graph, tape, data sheet, data processing card, printout, microfilm or microfiche, index, diary entry, note of interview

or communication, or any data compilation including all drafts of all such documents. The phrase "data compilation" includes, but is not limited to, any material stored on or accessible through a computer or other information storage or retrieval system, including videotapes and tape recordings.

2. "OGD" means Ohngo Gaudadeh Devia, any of its officials, directors, agents, employees, representatives, and its attorneys.

3. "Consultant" means any person who provides professional or technical input, advice and/or opinion to OGD whether that person is employed specifically for this case or is a regular OGD employee or official.

I. Board Contention 25 (OGD O) Environmental Justice Issues Are Not Addressed

A. Document Requests – OGD O

The Applicant requests OGD to produce the following documents directly or indirectly within their possession, custody or control to the extent not previously produced during informal discovery:

1. All documents related to the claims raised by OGD in Contention OGD O, as admitted by the Board.
2. All documents, data or other information generated, reviewed, considered or relied upon by any expert or consultant assisting OGD with respect to OGD O.
3. All calculations, studies, evaluations, analyses or other documents relating to risks to persons or property (including the proposed PFS ISFSI) and/or environmental impacts from activities or materials (including hazardous materials transportation) at, or emanating from: 1) Dugway Proving Ground, 2) Deseret

Chemical Depot (including CAMDS and the TOCDF chemical weapons incinerators), 3) Tooele Army Depot, North Area, 4) Envirocare mixed waste and low-level waste landfill, 5) Clive hazardous waste storage facility, 6) Aptus hazardous waste incinerator, and 7) Grassy Mountain hazardous waste landfill.

4. All documents relating to specific accidents that have occurred involving activities or materials (including hazardous materials transportation) at, or emanating from, 1) Dugway Proving Ground, 2) Deseret Chemical Depot (including CAMDS and the TOCDF chemical weapons incinerators), 3) Tooele Army Depot, North Area, 4) Envirocare mixed waste and low-level waste landfill, 5) Clive hazardous waste storage facility, 6) Aptus hazardous waste incinerator, and 7) Grassy Mountain hazardous waste landfill, which OGD claims would have produced an environmental impact cumulative with those of PFS ISFSI, had it been constructed and operating at the time of the accident.

5. All documents relating to potential accidents that OGD claims could occur involving activities or materials (including hazardous materials transportation) at, or emanating from, from, 1) Dugway Proving Ground, 2) Deseret Chemical Depot (including CAMDS and the TOCDF chemical weapons incinerators), 3) Tooele Army Depot, North Area, 4) Envirocare mixed waste and low-level waste landfill, 5) Clive hazardous waste storage facility, 6) Aptus hazardous waste incinerator, and 7) Grassy Mountain hazardous waste landfill, that OGD claims would produce an environmental impact cumulative with that of the PFS ISFSI.

6. All documents concerning the specific disproportionately high and adverse economic and sociological impacts that OGD contends the construction, operation, and decommissioning of the PFS ISFSI will have on the community of Goshute Indians.

7. All documents concerning the disproportionately high and adverse economic and sociological impacts allegedly suffered by low-income or minority populations as a result of the construction and operation of industrial facilities in the United States.

8. All documents concerning the alleged economic and sociological impacts that the construction, operation, and decommissioning of the PFS ISFSI will have on the community of Goshute Indians to which OGD contends the Goshute Indians are particularly susceptible.

9. All documents concerning the specific factors peculiar to the Goshute Indians that assertedly make them susceptible to the alleged economic and sociological impacts that the construction, operation, and decommissioning of the PFS ISFSI will have on the community of Goshute Indians.

10. All documents concerning the scientific, technical, or sociological basis for believing that the factors described in Document Request No. 9 pertain to the Goshute Indians.

11. All documents concerning the economic and sociological impacts generally to which OGD contends the Goshute Indians are particularly susceptible, the specific factors peculiar to the Goshute Indians that assertedly make them so susceptible, and the scientific, technical, or sociological basis for believing that such factors pertain to the Goshute Indians.

12. All documents concerning property values in and around the Skull Valley Goshute community that OGD asserts will be affected by the construction or operation of the PFS ISFSI, including the current value of those parcels of property that would allegedly be affected, and the specific changes in their asserted values that would allegedly be caused by the construction and operation of the PFS ISFSI.

Respectfully submitted,


Jay E. Silberg

Ernest L. Blake, Jr.

Paul A. Gaukler

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Dated: May 13, 1999

Counsel for Private Fuel Storage L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Applicant's First Set of Document Requests to Intervenor OGD" were served on the persons listed below (unless otherwise noted) by e-mail with conforming copies by U.S. mail, first class, postage prepaid, this 13th day of May 1999.

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Attention: Rulemakings and Adjudications
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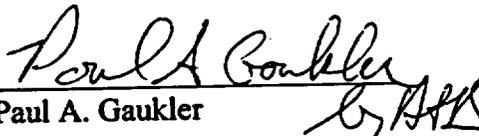
* By U.S. mail only

* Adjudicatory File
Atomic Safety and Licensing Board Panel
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