

Exhibit 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

)
)
)
)
)

Docket No. 72-22-ISFSI

ASLBP No. 97-732-02-ISFSI

June 25, 1999

DECLARATION OF M. LEE ALLISON, Ph.D.

I, M. Lee Allison, 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 June 28, 1999, relating to Utah Contention L, limited to Responses to Admission Requests Nos. 1 through 4, and the Geomatrix Study, in particular to Interrogatory Responses Nos. 1, 2, and part of 5, are true and correct to the best of my knowledge, information and belief.

Executed this 25th day of June, 1999.

By:



M. Lee Allison, Ph.D.
Director
Utah Geological Survey
Utah Department of Natural Resources

UNITED STATES OF AMERICA
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In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

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) Docket No. 72-22-ISFSI
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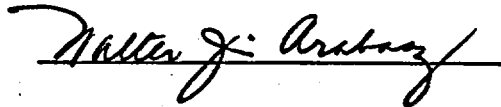
) June 24, 1999
)

DECLARATION OF DR. WALTER J. ARABASZ

I, Dr. Walter J. Arabasz, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to Interrogatories Nos. 3 and 4 for Utah Contention L and responses to document requests relating thereto.

Dated this 24th day of June, 1999.

By:



Walter J. Arabasz, PhD
Research Professor of Geology and Geophysics,
University of Utah;
Director, University of Utah Seismograph Stations

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

June 23, 1999

Steven F. Bartlett, Ph.D., P.E.
Research Project Manager, Research Division
Utah Department of Transportation

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

)
) Docket No. 72-22-ISFSI
)

) ASLBP No. 97-732-02-ISFSI
)

) June 28, 1999
)

DECLARATION OF DENISE CHANCELLOR, ESQ.

I, Denise Chancellor, Esq., 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 June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to responses to General Discovery Requests and Document Requests for Contention W.

Executed this 28th day of June, 1999.

By: 

Denise Chancellor, Esq.
Assistant Attorney General
Utah Attorney General's Office

UNITED STATES OF AMERICA
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In the Matter of:

)
) Docket No. 72-22-ISFSI
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PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)


) ASLBP No. 97-732-02-ISFSI
)
) June 17, 1999

DECLARATION OF CHRIS S. CRNICH, DVM

I, Chris S. Crnich, 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, dated June 28, 1999, relating to Utah Contention DD, limited to livestock and farm produce, are true and correct to the best of my knowledge, information and belief.

Executed this 17th day of June, 1999.

By: _____


Chris S. Crnich, DVM
Manager
Meat and Poultry Inspection Bureau
Utah Department of Agriculture

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

)
) Docket No. 72-22-ISFSI
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PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

) ASLBP No. 97-732-02-ISFSI
)
) June 16, 1999
)

DECLARATION OF MERTON A. FRANKLIN

I, Merton A. Franklin, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 25, 1999, relating to Utah Contention DD, limited to Pohl's milkvetch and small spring parsley, are true and correct to the best of my knowledge, information and belief.

Executed this 16th day of June, 1999.

By:

Merton A. Franklin

Merton A. Franklin
Botanist
Utah Natural Heritage Program
Utah Division of Wildlife Resources
Utah Department of Natural Resources

UNITED STATES OF AMERICA
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

)
) Docket No. 72-22-ISFSI
)

) ASLBP No. 97-732-02-ISFSI
)

) June 16, 1999
)

DECLARATION OF DR. FRANK P. HOWE

I, Dr. Frank P. Howe, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 18, 1999, relating to Utah Contention DD, limited to peregrine falcons, are true and correct to the best of my knowledge, information and belief.

Executed this 16th day of June, 1999.

By:



Frank P. Howe, PhD
Non-Game Avian Program Coordinator
Utah Division of Wildlife Resources
Utah Department of Natural Resources

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

June 24, 1999

**Jerry D. Olds, P.E.,
Assistant State Engineer,
Division of Water Rights
Utah Department of Natural Resources**

UNITED STATES OF AMERICA
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

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) Docket No. 72-22-ISFSI
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) ASLBP No. 97-732-02-ISFSI
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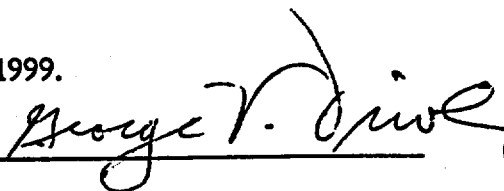
) June 16, 1999
)

DECLARATION OF GEORGE V. OLIVER

I, George V. Oliver, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 18, 1999, relating to Utah Contention DD, limited to pocket gophers, are true and correct to the best of my knowledge, information and belief.

Executed this 16th day of June, 1999.

By: _____



George V. Oliver
Chief Zoologist
Utah Natural Heritage Program
Utah Division of Wildlife Resources
Utah Department of Natural Resources

UNITED STATES OF AMERICA
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

)
) Docket No. 72-22-ISFSI
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PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

) ASLBP No. 97-732-02-ISFSI
)
) June 15, 1999

DECLARATION OF DR. FARHANG OSTADAN

I, Dr. Farhang Ostadan, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 18, 1999, relating to Utah Contentions L and GG, limited to soil dynamics and soil-structure interaction, are true and correct to the best of my knowledge, information and belief.

Executed this 15th day of June, 1999.

By: 

Farhang Ostadan, PhD
Consultant for Soil Dynamics and Soil Structure
Interaction

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

)
) Docket No. 72-22-ISFSI
)


PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

) ASLBP No. 97-732-02-ISFSI
)
) June 23, 1999

DECLARATION OF DON A. OSTLER, P.E.

I, Don A. Ostler, P.E., hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to responses for Utah Contention O (with the exception of water usage) and corresponding responses to document requests.

Executed this 23rd day of June, 1999.

By: 

Don A. Ostler, P.E.
Director, Division of Water Quality
Department of Environmental Quality

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD


In the Matter of:)	Docket No. 72-22-ISFSI
)	
PRIVATE FUEL STORAGE, LLC)	ASLEP No. 97-732-02-ISFSI
(Independent Spent Fuel)	
Storage Installation))	June 24, 1999

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

)
) Docket No. 72-22-ISFSI
)

) ASLBP No. 97-732-02-ISFSI
)

) June 18, 1999
)

DECLARATION OF DAVID A. SCHLISSEL

I, David A. Schlissel, 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, dated June 28, 1999, relating to Utah Contentions E, S, Z, and AA, are true and correct to the best of my knowledge, information and belief.

Executed this 18th day of June, 1999.

By:

David A. Schlissel

David A. Schlissel
President
Schlissel Technical Consulting, Inc.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

)

) Docket No. 72-22-ISFSI

)

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

)

) ASLBP No. 97-732-02-ISFSI

)

) June 21, 1999

DECLARATION OF MICHAEL F. SHEEHAN, Ph.D.

I, Michael F. Sheehan, 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, dated June 28, 1999, relating to Utah Contentions E, S, Z, and AA, are true and correct to the best of my knowledge, information and belief.

Executed this 21st day of June, 1999.

By:



Michael F. Sheehan, Ph.D.
Osterberg & Sheehan