

July 19, 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)	)	ASLBP No. 97-732-02-ISFSI

**APPLICANT'S AMENDED RESPONSE TO  
STATE'S SECOND REQUESTS FOR DISCOVERY (GROUP I)**

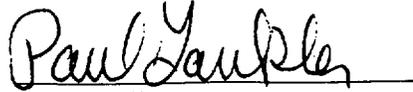
Private Fuel Storage L.L.C. files an amendment to its June 4, 1999 response to the State's Second Request for Discovery. This response amends Interrogatory No. 1 for Utah Contention M - Flooding.

**INTERROGATORIES - Utah Contention M.**

**INTERROGATORY NO. 1.** Supply the exact lowest elevation of the proposed ISFSI site and describe surveys or other methods by which PFS determined the exact lowest elevation.

**APPLICANT'S AMENDED RESPONSE:** PFS hereby incorporates its response to Contention M - Interrogatory No. 1 dated June 4, 1999 into this amended response, and amends it as follows: The finished elevation (top of concrete) of the northernmost row of concrete storage pads, which are the lowest structures important to safety, will be 4463 ft.

Respectfully submitted,

A handwritten signature in cursive script that reads "Paul Gaukler". The signature is written in black ink and is positioned above a horizontal line.

Jay E. Silberg

Ernest L. Blake, Jr.

Paul A. Gaukler

SHAW PITTMAN

2300 N Street, N.W.

Washington, DC 20037

(202) 663-8000

Counsel for Private Fuel Storage L.L.C.

Dated: July 19, 1999

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

DECLARATION OF JERRY COOPER

Jerry Cooper states as follows under penalties of perjury:

1. I am the Project Engineer with Stone & Webster Engineering Corporation (Stone & Webster) for the Private Fuel Storage Facility ("PFSF") project. As Project Engineer for the PFSF, I am responsible for the execution and integration of the technical activities for the project.
2. I am duly authorized to verify "Applicant's Amended Response To State's Second Requests For Discovery (Group I)," specifically Utah Contention M Interrogatory No. 1.
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 19, 1999.

  
 \_\_\_\_\_  
 Jerry Cooper

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

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the "Applicant's Amended Response To State's Second Requests For Discovery (Group I)," dated July 19, 1999, and supporting Declaration from Jerry Cooper 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 19th day of July, 1999.

G. Paul Bollwerk III, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
e-mail: [GPB@nrc.gov](mailto:GPB@nrc.gov)

Dr. Jerry R. Kline  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
e-mail: [JRK2@nrc.gov](mailto:JRK2@nrc.gov) and [kjerry@erols.com](mailto:kjerry@erols.com)

Dr. Peter S. Lam  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
e-mail: [PSL@nrc.gov](mailto:PSL@nrc.gov)

\* Susan F. Shankman  
Deputy Director, Licensing & Inspection  
Directorate, Spent Fuel Project Office  
Office of Nuclear Material Safety &  
Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attention: Rulemakings and Adjudications  
Staff  
e-mail: [hearingdocket@nrc.gov](mailto:hearingdocket@nrc.gov)  
(Original and two copies)

\* Adjudicatory File  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Catherine L. Marco, Esq.  
Sherwin E. Turk, Esq.  
Office of the General Counsel  
Mail Stop O-15 B18  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
e-mail: [pfscase@nrc.gov](mailto:pfscase@nrc.gov)

John Paul Kennedy, Sr., Esq.  
Confederated Tribes of the Goshute  
Reservation and David Pete  
1385 Yale Avenue  
Salt Lake City, Utah 84105  
e-mail: [john@kennedys.org](mailto:john@kennedys.org)

Diane Curran, Esq.  
Harmon, Curran, Spielberg &  
Eisenberg, L.L.P.  
1726 M Street, N.W., Suite 600  
Washington, D.C. 20036  
e-mail: [dcurran@harmoncurran.com](mailto:dcurran@harmoncurran.com)

Denise Chancellor, Esq.  
Assistant Attorney General  
Utah Attorney General's Office  
160 East 300 South, 5<sup>th</sup> Floor  
P.O. Box 140873  
Salt Lake City, Utah 84114-0873  
e-mail: [dchancel@state.UT.US](mailto:dchancel@state.UT.US)

Joro Walker, Esq.  
Land and Water Fund of the Rockies  
2056 East 3300 South, Suite 1  
Salt Lake City, UT 84109  
e-mail: [joro61@inconnect.com](mailto:joro61@inconnect.com)

Danny Quintana, Esq.  
Skull Valley Band of Goshute Indians  
Danny Quintana & Associates, P.C.  
50 West Broadway, Fourth Floor  
Salt Lake City, Utah 84101  
e-mail: [quintana@xmission.com](mailto:quintana@xmission.com)

\*By Hand Delivery only

  
Paul A. Gaukler