



OFFICE OF THE
GENERAL COUNSEL

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 24, 1999

Office of the Secretary
Attn: Rulemakings and Adjudicatory Staff
Washington, DC 20555-0001

In the Matter of
Private Fuel Storage, L.L.C.
Docket No. 72-22-ISFSI

Enclosed please find the signed original affidavits to replace the facsimile copies sent as attachments to the August 20, 1999, "NRC Staff's Objections and Responses to the State of Utah's Second Set of Discovery Requests Directed to the NRC Staff."

1. Affidavit of Budhi Sagar
2. Supplemental Affidavit of Amitava Ghosh

Sincerely,

Catherine L. Marco

Catherine L. Marco
Counsel for NRC Staff

Enclosure: As stated

cc w/o enclosure:

G. Paul Bollwerk, Esq.
Dr. Jerry R. Kline
Dr. Peter S. Lam
Jay Silberg, Esq.
John Paul Kennedy, Sr.

Denise Chancellor, Esq.
Diane Curran, Esq.
Richard E. Condit, Esq.
Joro Walker, Esq.
Danny Quintana, Esq.

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
)
(Independent Spent Fuel)
Storage Installation))

AFFIDAVIT OF BUDHI SAGAR

I, Budhi Sagar, having first been duly sworn, do hereby state as follows:

1. I am the Technical Director of the Center for Nuclear Waste Regulatory Analyses, which is a division of the Southwest Research Institute in San Antonio, Texas. I am providing this affidavit under a technical assistance contract between the NRC Staff and the Southwest Research Institute.

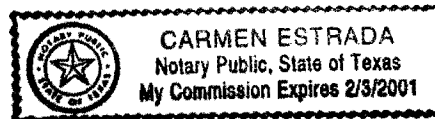
2. I have reviewed the foregoing "NRC Staff's Objections and Responses to the State of Utah's Second Set of Discovery Requests Directed to the NRC Staff," as they pertain to Utah Contention K (Credible Offsite Hazards) and verify that they are true and correct to the best of my information and belief.

Budhi Sagar

Sworn to before me this
20th day of August 1999

Notary Public

My Commission expires: _____



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
)
(Independent Spent Fuel)
Storage Installation))

SUPPLEMENTAL AFFIDAVIT OF AMITAVA GHOSH

I, Amitava Ghosh, having first been duly sworn, do hereby state as follows:

1. I am employed as a Principal Engineer at the Center for Nuclear Waste Regulatory Analyses, which is a division of the Southwest Research Institute in San Antonio, Texas. I am providing this affidavit under a technical assistance contract between the NRC Staff and the Southwest Research Institute. A statement of my professional qualifications is attached hereto.

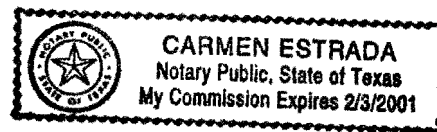
2. I have reviewed the foregoing "NRC Staff's Objections and Responses to the State of Utah's Second Set of Discovery Requests Directed to the NRC Staff," as they pertain to Utah Contention K (Credible Offsite Hazards) and verify that they are true and correct to the best of my information and belief.



Amitava Ghosh

Sworn to before me this
20th day of August 1999

Notary Public



My Commission expires: _____