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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Commission

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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

**CORRECTION TO APPLICANT'S MOTION FOR  
SUMMARY DISPOSITION OF UTAH CONTENTION L**

Applicant Private Fuel Storage, L.L.C. ("Applicant" or "PFS") hereby files this correction to "Applicant's Motion for Summary Disposition of Utah Contention L" ("Motion") dated Saturday, December 30, 2000. A footnote that Applicant had intended to include in the Motion at end of the second to the last sentence of Section II.A (on page 9) was inadvertently omitted from the final in the haste to serve the Motion. Specifically, the second to the last sentence of Section II.A, together with the footnote that was inadvertently omitted (designated below as footnote 15a), should read as follows:

Although Dr. Allison seeks to raise various concerns with respect to the adequacy of the input information utilized by Geomatrix to evaluate the ground surface displacement hazard at the PFSF, he has failed to come forward with any material issue of fact to challenge the adequacy of the inputs to ground surface displacement hazard computed by Geomatrix for the PFSF site.<sup>15a</sup>

<sup>15a</sup> Further, Dr. Allison describes himself as a structural geologist (Allison Dep. at 15), and his experience regarding analysis of earthquake hazards has been extremely limited. He processed seismographic data from an Elsinore fault earthquake as part of his Master's thesis in the early 1970s (Allison Dep. at 18-19), used seismometers to try to locate microseismic events in a study during the 1980s (id. at 19-20), and subsequently served on several boards and councils, charged with evaluating, overseeing or creating broad policy in regard to earthquake hazard evaluation, which involved no data gathering, evaluation or analysis on his part. Id. at 21-24. Dr. Allison's sole experience in data gathering and analysis relating to fault identification relates to in situ stress measurement techniques. Id. at 24-28. Dr. Allison's background thus does not exhibit the broad depth of seismic hazard analysis self evident in the curriculum vita of Dr. Copper-smith, Dr. Youngs, and the State's other witness, Dr. Walter Arabasz.

Counsel for applicant apologizes for any confusion created by this error.

Respectfully submitted,



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Dated: January 2, 2001

**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

**CERTIFICATE OF SERVICE**

I hereby certify that copies of Correction to Applicant's Motion for Summary Disposition Of Utah Contention L 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 2nd day of January 2001.

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