



Utah DSO9 J. Souder

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DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF THE EXECUTIVE DIRECTOR

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July 23, 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

David Meyer, Chief Rules and Directive's Branch Office of Administration U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Re: Private Fuel Storage L.L.C. Independent Spent Fuel Storage Installation Local Public Document Room

Dear Mr. Meyer:

I commend the Nuclear Regulatory Commission's (NRC) decision to establish a local public document room (LPDR) for the Private Fuel Storage Limited Liability Corporation (PFSLLC) Independent Spent Fuel Storage Installation (ISFSI) proposed for the Skull Valley Goshute Indian Reservation, Utah. Because of the potential impact of the proposed licensing of the PFSLLC ISFSI, it is essential that residents of the Skull Valley Goshute Reservation, Tooele County, surrounding counties (i.e., Salt Lake, Davis, Box Elder, Utah, and Juab), and the State of Utah have reasonable access to PFSLLC's license application and all documents referenced in the application.

The PFSLLC references and incorporates by reference a number of independent documents. To my knowledge, a number of these documents are not available within the State of Utah, let alone readily accessible to the general public. For example, the application references a number of NRC guidance documents, the safety analysis reports for the two proposed cask systems, a previously approved quality assurance program, various manuals depicting national standards and codes, technical publications, environmental impact statements, etc.

Without access to the referenced material, much of the license application review becomes meaningless. It is difficult for individuals to determine what actions, if any, they should pursue. Thus, in order for the LPDR to serve its purpose and to have an open and meaningful public forum,

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prior to docketing the license application, LPDRs should be established with the license application, applicable NRC notices, and other applicable documents, including ALL documents referenced in the license application.

Due to the critical nature of the issues involved with licensing a high level nuclear waste storage facility, NRC's formal procedures, and the short time in which parties have to determine their need to intervene in the process, I recommend that two LPDR's be established. First, for residents of the Skull Valley Goshute Reservation and Tooele County, I recommend a LPDR be established at the Tooele City Public Library. The Tooele City Public Library is located in the county seat and is the closest public library to the proposed site. The Tooele City Public library is open Tuesday through Saturday from 11 to 7 pm. In addition, the Tooele City Public Library has served as a public document room for other environmental proposals in Tooele County.

Utah residents outside of Tooele County also have a large stake in the siting of this ISFSI. In fact, most of the residents of Salt Lake County and portions of Utah, Davis, and Juab counties are located within a 40 mile radius of the PFSLLC site. Moreover, spent nuclear fuel may be transported directly through these adjoining counties, as well as other areas of Utah. Thus, I recommend that a LPDR also be established at the University of Utah Marriott Library (Marriott Library), Special Collections section located in Salt Lake City.

The Marriott Library is located within a reasonable proximity to Tooele County and all counties which may be directly impacted by the proposed site. In addition, the Marriott Library is located in the state's capitol, which is also Utah's population center. The Marriott Library best meets the LPDR consideration criteria specified in the public notice.

1. The Marriott Library is a depository for federal publications and is the closest federal depository to the proposed site. Additionally, the Marriott Library serves as a state document depository and has a history of impartially serving the public.
2. The Marriott Library serves a large university and has adequate facilities available for housing the LPDR documents, a copying center within the library, and numerous tables and carrels available for patrons.
3. The Marriott Library staff are trained librarians who effectively assist the public. The Special Collections section has served as a repository for other environmental projects. In addition, the Special Collections section is particularly interested and helpful in assisting the public in obtaining access and information to time sensitive issues that are critical to Utahns.
4. As previous stated, the Marriott Library is a depository for federal publications. The Marriott Library also has a complete copy of federal rules and statutes. In addition, the library contains over 2 million books and 13,000 periodical subscriptions that may serve as additional references to the interested public.

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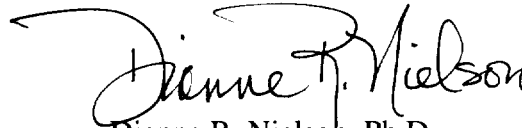
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5. The Marriott Library is accessible to the general public seven days a week. Extended hours from 7 am to 10 pm are available Monday through Thursday. Fridays from 7 am to 6 pm. Saturdays from 9 am to 6 pm. Sundays from 1 to 5 pm. Fall and winter hours are usually extended. The Marriott Library has handicap access, available parking, and is accessible through public transportation.

I strongly urge you to establish two LPDRs for the different needs of Utah citizens. However, if only one LPDR is established, I urge you to locate it at the Marriott Library. Although, the Marriott library is located farther from the proposed site than the Tooele City Public Library, the Marriott Library is already a federal depository, it has seven day access, it is open for extended hours, it is located in the proximity to the largest number of citizens, it can better serve the public due to its larger staff, and it has a number of other resources available to assist the public in their review of the license application and applicable documents.

Thank you for your consideration. If you have any questions or need assistance in finding LPDR contacts please call Connie S. Nakahara at 801-536-4231.

Best regards,

A handwritten signature in black ink that reads "Dianne R. Nielson". The signature is fluid and cursive, with a large initial "D" and "N".

Dianne R. Nielson, Ph.D.
Executive Director

cc: Denise Chancellor, Attorney General's Office