

RELATED CORRESPONDENCE

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February 16, 2001

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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

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

**APPLICANT'S FIRST SUPPLEMENTAL RESPONSE
TO SUWA'S FIRST REQUESTS FOR DISCOVERY**

Applicant Private Fuel Storage L.L.C. ("Applicant" or "PFS") files this First Supplemental Response to "Southern Utah Wilderness Alliance's (SUWA) of Utah's First Set of Discovery Requests Directed to the Applicant," dated May 10, 1999 ("SUWA's First Discovery Requests"). The Applicant files this Supplemental Response pursuant to 10 C.F.R. § 2.740(e), to name witnesses it may call at hearing. The Applicant's original response to SUWA's First Discovery Requests noted that it would file such supplemental responses as it identified additional witnesses.¹

I. INTERROGATORIES

INTERROGATORY NO. 2. Please give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person PFS expects to call as a witness or expect witness the subject matter about which each witness or expert witness and the subject matter about which each witness or expert witness will testify at the hearing with regard to SUWA's admitted contention for each expert witness, please include a list of all publications she or he authored within the preceding ten years and a list of any other cases in which the witness testified as an expert at a trial, hearing or by deposition within the preceding four years. Please describe the subject matter on which each of the witnesses is expected to testify at the hearing by

¹ Applicant's Objections and Responses to SUWA's First Requests for Discovery, dated May 20, 1999 at 4.

detailing the facts and opinions to which each witness is expected to testify, including a summary of the grounds for each opinion, and identifying the documents (including all pertinent pages or parts thereof), data or other information which each witness has reviewed and considered, or is expected to consider or to rely on for her or his testimony.

APPLICANT'S RESPONSE: The Applicant supplements its response to SUWA's First Discovery Requests by identifying the following persons whom the Applicant may call as witnesses at the hearing with respect to SUWA's admitted contention. The Applicant is still in the process of identifying witnesses that it expects to call at the hearings and will supplement this response in accordance with 10 C.F.R. § 2.740(e).

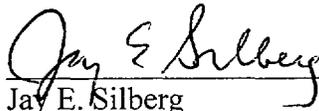
SUWA Contention B

<u>Name and Address:</u>	John Donnell Stone & Webster Engineering Corp. 7677 Berry Avenue Englewood, Colorado 80111-2137
<u>Profession:</u>	Project Director
<u>Employer:</u>	Private Fuel Storage L.L.C.
<u>Professional Expertise:</u>	See attached resume.
<u>Educational, Scientific Experience, and Professional Qualifications:</u>	See attached resume.
<u>Publications in the last ten years:</u>	See attached resume.
<u>Testifying experience as expert in last four years:</u>	Deposition on Utah B in PFS licensing procedure.
<u>Subject Matter of Testimony:</u>	Mr. Donnell will testify concerning alternatives considered by PFS with respect to the proposed rail line from the main line of the Union Pacific Railroad to the PFSF and the related environmental impacts.

Documents reviewed and/or
relied upon:

The documents and materials reviewed and relied upon by Mr. Donnell will include the PFS License Application, including the Environmental Report, responses to Requests for Additional Information, and the Draft Environmental Impact Statement. In addition, Mr. Donnell may review and rely upon documents produced by PFS, the NRC Staff, SUWA and the State as well as any new information that may come into the possession of PFS.

Respectfully submitted,



Jay E. Silberg
Ernest L. Blake, Jr.
Paul A. Gaukler
D. Sean Barnett
SHAW PITTMAN
2300 N Street, N.W.
Washington, DC 20037
(202) 663-8000

Dated: February 16, 2001

Counsel for Private Fuel Storage L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's First Supplemental Response to SUWA'S First Requests for Discovery, the attached resumes and declaration of Paul Gaukler 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 16th day of February 2001.

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

Dr. Jerry R. Kline
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Dr. Peter S. Lam
Administrative Judge
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* 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
(Original and two copies)

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

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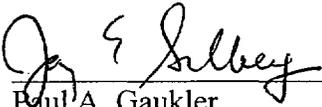
Richard E. Condit, Esq.
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for Paul A. Gaukler

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Before the Atomic Safety and Licensing Board

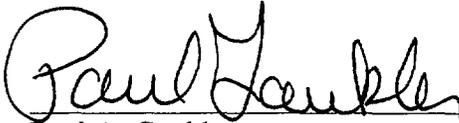
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DECLARATION OF PAUL A. GAUKLER

Paul A. Gaukler states as follows under penalties of perjury:

1. I am with Shaw Pittman in Washington, D.C.
2. I am duly authorized to verify Applicant's First Supplemental Response to SUWA's First Requests for Discovery; specifically, the supplemental response to Interrogatory No. 2.
3. I certify that the statements in such responses are true and correct to the best of my personal knowledge and belief.
4. I declare under penalty and perjure that the foregoing is true and correct.

Executed on February 16, 2001.


Paul A. Gaukler

RESUME OF
JOHN L. DONNELL

JOHN L. DONNELL

Project Manager

EXPERIENCE SUMMARY

Mr. Donnell has 21 years of experience in nuclear project management and engineering. Currently, he is Project Manager for the Private Fuel Storage Facility project. The project is sponsored by a consortium of eleven utilities to develop a central interim storage facility for commercial spent nuclear fuel. In addition, he is the Project Manager for plant modifications work at the Prairie Island Nuclear Generating Plant for Northern States Power Company. His duties as Project Manager includes overall project direction, estimating, contract administration, controlling project costs, and scope change control.

He is also coordinating the corporate Stone and Webster Spent Independent Spent Fuel Storage Installation (ISFSI) Program and supporting all initiatives in this focus area of the power sector. In this capacity, he is responsible for project scoping, staffing, providing estimates, recommending spent fuel storage technology selection, and interfacing with client staff as well as state and federal agencies to support corporate goals for all spent fuel storage projects.

RELEVANT PROJECT EXPERIENCE

Private Fuel Storage LLC, Private Fuel Storage Facility - As Project Manager, responsible for the engineering, design, budget and schedule control for the project. Project scope includes production of all necessary federal licensing documents for submission to the NRC for this first of a kind private fuel storage facility supporting multiple nuclear utilities. The effort also includes site selection and characterization, preliminary facility engineering and design, and related facility and transportation infrastructures. The licensing documents are in compliance with the requirements of 10 CFR Part 72. Detailed engineering and design will follow the licensing effort for the storage facility, support buildings, and transportation system.

Northern States Power Goodhue County ISFSI, Prairie Island Nuclear Generating Plant - As Project Manager, responsible for overall project direction to support the site characterization study, engineering and design, and licensing for this offsite ISFSI. The licensing documents are in compliance with the requirements of 10 CFR Part 72. Duties included:

- Providing support and attending the public forum meetings.
- Participating in the site selection process and ISFSI conceptual design.
- Supervising the development of a storage technology assessment.
- Supervising the development of a storage technology bid specification.
- Supervising the development of the Minnesota State Application for Site Certificate.

He also supervised the development of the NRC License Application, including the preparation of the Safety Analysis Report (SAR), Environmental Report (ER), Emergency Plan (EP), and Security Plan (SP).

Northern States Power, Prairie Island Nuclear Generating Plant ISFSI - As Project Manager and Project Engineer, he was responsible for this project from the preparation of the license application through site operation. Project scope included:

- Generation of federal licensing documents for submission to the NRC. This effort provided the utility with a draft SAR, ER, technical specifications, and decommissioning plan.
- Engineering and design, including site selection, geotechnical studies, security system, cask monitoring system, radiation monitoring system, perimeter shielding berm, facility support

services, road access, cask transporter design review, and procurement support.

He also supervised the auxiliary building crane trolley upgrade to single-failure-proof. This project replaced the existing crane trolley with a single-failure-proof trolley operation to support the movement of the 125-ton spent fuel storage casks within the plant.

Northern States Power Company, Prairie Island Nuclear Generating Plant - As Project Manager, responsible for the overall day-to-day management of all Stone & Webster project activity at this power plant and interface with the utility management team, including departmental and project team members. Programmatic interfaces to the client project team were developed to utilize the best and most appropriate resources from both organizations. Individual task assignments include the development of more than thirty conceptual engineering studies, execution of the engineering and design for more than seventy-four modification tasks, and the preparation of Design Basis Documents.

Portland General Electric Company, Trojan Nuclear Plant - As Project Manager, responsible for all work performed by Stone & Webster at this power plant. Work included:

- Reviewing the decommissioning plan prior to submission to the NRC.
- Performing a facilities review to establish bid evaluation criteria to be used to select the storage technology vendor for an onsite ISFSI.
- Supporting the vendor selection process.
- Preparing a technical report identifying the available storage technologies, operational characteristics, and the implementation of a risk management program for the spent fuel project.
- Performing an evaluation to develop the strategy necessary to terminate the Part 50 License with the loaded ISFSI onsite.

EDUCATION

B.S., Electrical Engineering - University of Toledo

ASME Short Course Program - ASME Boiler & Pressure Vessel Code: Section III, Divisions 1 & 2, Quality Assurance for Design and Inspection of Nuclear Power Plant Components

LICENSES AND REGISTRATIONS

Professional Engineer - Colorado, Ohio, Minnesota