

RAS 3465

ShawPittman LLP

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**By Electronic Filing and U.S. Mail**

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Emile L. Julian  
Assistant for Rulemakings and Adjudications  
Rulemakings and Adjudications Staff  
Office of the Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike, One White Flint North  
Rockville, MD 20852-2738  
Attn: Rulemakings and Adjudications Staff

**Re: Private Fuel Storage L.L.C., Docket No. 72-22, ASLBP No. 97-732**

Dear Mr. Julian:

Enclosed please find the signed originals of the declarations of C. Allin Cornell, Alan Soler and Jeffrey R. Johns affirming discovery responses in Applicant's Objections and Responses to the State of Utah's Eleventh Set of Discovery Requests Directed to the Applicant to replace facsimile copies thereof.

Please call me at 202-663-8304 if you have any questions.

Sincerely,



Paul A. Gaukler

Enclosures

cc: G. Paul Bollwerk, Esq. (without enclosures)  
Dr. Jerry R. Kline (without enclosures)  
Dr. Peter S. Lam (without enclosures)  
Sherwin E. Turk, Esq. (without enclosures)  
David W. Tufts, Esq. (without enclosures)  
Denise Chancellor, Esq. (without enclosures)  
Diane Curran, Esq. (without enclosures)  
Richard E. Condit, Esq. (without enclosures)  
Joro Walker, Esq. (without enclosures)  
Tim Vollmann, Esq. (without enclosures)  
Paul C. EchoHawk, Esq. (without enclosures)

Template = SECY-018

SECY-02

**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

**DECLARATION OF DR. ALAN SOLER**

Dr. Alan Soler states as follows under penalties of perjury:

1. I am an Executive Vice-President with Holtec International. In this position, I am responsible for the development of analytical methods to evaluate cask designs.
2. I am duly authorized to verify Applicant's Response to State's Eleventh Requests for Discovery; specifically, Interrogatory No. 15, Items 6-8.
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 October 2, 2001.

  
\_\_\_\_\_  
Dr. Alan Soler

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**Before the Atomic Safety And Licensing Board**

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

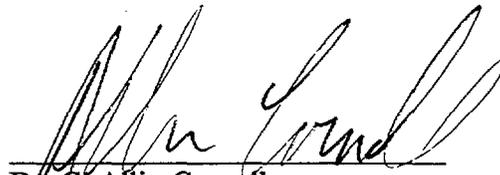
**DECLARATION OF DR. C. ALLIN CORNELL**

Dr. C. Allin Cornell states as follows under penalties of perjury:

1. I am a Professor at Stanford University and a consultant to Private Fuel Storage, L.L.C.
2. I am duly authorized to verify Applicant's Response to State of Utah's Eleventh Requests for Discovery; specifically, Interrogatory No. 15, Item 9.
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 October 2, 2001.

  
\_\_\_\_\_  
Dr. C. Allin Cornell

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

DECLARATION OF JEFFREY R. JOHNS

Jeffrey R. Johns states as follows under penalties of perjury:

1. I am the Lead Licensing Engineer with Stone & Webster, Inc. for the Private Fuel Storage Facility ("PFSF") project. As the Lead Licensing Engineer for the PFSF, I am responsible for technical and licensing activities for the project.

2. I am duly authorized to verify Applicant's Response to the State of Utah's Eleventh Requests for Discovery; specifically, the response to Request for Admission Nos. 14 and 22 and the response to Interrogatory No. 15, Items 1-5.

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 October 2, 2001.

  
Jeffrey R. Johns