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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

OFFICE OF THE SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
•) Docket No. 72-22-ISFSI
PRIVATE FUELS STORAGE, LLC)
	ASLBP No. 97-732-02-ISFI
(Independent Spent Fuel Storage	
Installation)	October 24, 2001
,)

OGD RESPONSE TO STATE OF UTAH'S REQUEST FOR ADMISSION OF LATE-FILED CONTENTION UTAH RR (Suicide Mission Terrorism and Sabotage)

Ohngo Gaudadeh Devia ("OGD") hereby submits its response to the State of Utah's request for admission of late-filed contention RR.

On October 10, 2001, the State of Utah filed a petition seeking admission of late-filed contention Utah RR in light of the unexpected and unprecedented events of September 11, 2001. Utah RR challenges the failure of Private Fuel Storage, LLC's ("PFS's") Safety Analysis Report ("SAR"), PFS's Environmental Report ("ER"), the Safety Evaluation Report, September 2000 ("SER"), and the draft Environmental Impact Statement ("DEIS") to assess the impacts from suicide terrorist attacks and acts of sabotage that may occur at the proposed PFS spent fuel storage installation in Skull Valley.

Having reviewed the State of Utah's request for admission of late-filed contention Utah RR and the attached exhibits, OGD adopts and incorporates by this reference the entirety of the State of Utah's request for admission of late-filed contention Utah RR together will all attached exhibits.

The State of Utah meets the 10 CFR § 2.714(a) late-filed factors for proposing its contention Utah RR for the reasons stated in the State of Utah's request for admission of late-filed contention Utah RR that OGD hereby incorporates by reference.

For the reasons set forth above and incorporated herein by reference,
OGD hereby joins and adopts the request for admission of contention RR, and
requests that late-filed contention Utah RR be admitted.

Respectfully submitted this 24th day of October, 2001.

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2001, I caused to be served a true and correct copy of the foregoing by United States Mail, First Class and conforming copies by electronic mail, unless otherwise noted, and addressed to the following:

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