

RAS 3634

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

In the Matter of:

) Docket No. 72-22-ISFSI

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

) ASLBP No. 97-732-02-ISFSI

) October 23, 2001

STATE OF UTAH'S SUPPLEMENTAL RESPONSE  
TO APPLICANT'S SEVENTH SET OF FORMAL DISCOVERY REQUESTS

The State of Utah hereby supplements its previous response, dated September 28, 2001, to General Interrogatory No. 3 in Applicant's Seventh Set of Formal Discovery Requests to Intervenor State of Utah, dated September 18, 2001.

The State gives notice that it expects to call Farhang Ostadan, Ph.D. as an additional witness at the hearing on Utah L, Part B. Dr. Ostadan's area of testimony will be the adequacy of PFS's design to withstand the design basis ground motion.

The State also modifies the area of testimony for Dr. Resnikoff who was previously named as a witness for Utah L, Part B on September 28, 2001. Dr. Resnikoff's area of testimony will be the radiological consequences due to the seismic failure of structures, systems, and components important to safety.

The State has previously provided the Applicant with copies of resumes and declarations of both Dr. Ostadan and Dr. Resnikoff, either directly or as part of filings in this proceeding, including reference to those documents the witnesses have reviewed or

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relied upon. The State is in the process of determining whether any of those resumes or declarations need to be updated and will advise PFS if and when revisions thereto are available.

DATED this 23<sup>rd</sup> day of October, 2001.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of STATE OF UTAH'S SUPPLEMENTAL RESPONSE TO APPLICANT'S SEVENTH SET OF FORMAL DISCOVERY REQUESTS was served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class, this 23<sup>rd</sup> day of October, 2001:

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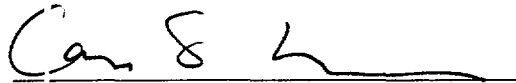
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