## ShawPittman LLP

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OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

March 20, 2002

## By E-mail and U.S. Mail

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: Docketing & Services Branch

> Private Fuel Storage – Docket No. 72-22 – ASLBP No. 97-732-02 Re:

To the Secretary of the Commission:

Enclosed please find the original signature pages for the Declarations of Robert Youngs, C.Y. Chang, Bruce Ebbeson, Alan Soler, Krishna P. Singh, (filed February 19, 2002) with respect to Applicant's Objections and Responses to the State of Utah's Fourteenth Set of Discovery Requests Directed to the Applicant). Also enclosed is a corrected original signature page for the Declaration of Paul J. Trudeau which is being served both electronically and by mail on the Board and the parties.

If you have any questions, please contact me at (202) 663-8304.

Sincerely,

Paul A. Gaukler

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## ShawPittman LLP

Emile L. Julian March 20, 2002 Page 2

cc:

Michael Farrar, Esq. (w/o encls. except corrected Trudeau declaration)
Dr. Jerry R. Kline (w/o encls. except corrected Trudeau declaration)
Dr. Peter S. Lam (w/o encls. except corrected Trudeau declaration)
Sherwin Turk, Esq. (w/o encls. except corrected Trudeau declaration)
Denise Chancellor, Esq. (w/o encls. except corrected Trudeau declaration)
Office of Appellate Adjudication (by mail only) (w/o encls. except corrected Trudeau declaration)
Adjudicatory File, Atomic Safety and Licensing Board Panel (by mail only) (w/o encls. except corrected Trudeau declaration)
Diane Curran, Esq. (w/o encls. except corrected Trudeau declaration)
David W. Tufts, Esq. (w/o encls. except corrected Trudeau declaration)
Tim Vollmann, Esq. (w/o encls. except corrected Trudeau declaration)
Joro Walker, Esq. (w/o encls. except corrected Trudeau declaration)

Paul EchoHawk, Esq. (w/o encls. except corrected Trudeau declaration)

## 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 ROBERT YOUNGS**

Robert Youngs states as follows under penalties of perjury:

- 1. I am a Geotechnical Consultant with Geomatrix Consulting, Inc.
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Requests for Admission Nos. 16-18, and Interrogatory No. 8, Item 12.
- 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 February 19, 2002

Robert Youngs

## 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 C. Y. CHANG**

- C. Y. Chang states as follows under penalties of perjury:
- 1. I am the Principal Engineer with Geomatrix Consulting, Inc.
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Requests for Admission Nos. 17-18, and Interrogatory No. 8, Items 12.
- 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 February 19, 2002

C. Y. Chang

### **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 BRUCE EBBESON**

Bruce Ebbeson states as follows under penalties of perjury:

- 1. I am the Senior Lead Structural Engineer with Stone & Webster.
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Request for Admission Nos. 13, 18, 23-24 and Interrogatory No. 7, Item 10, Interrogatory No. 8, Item 13.
- 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 February 20, 2002.

Bruce Ebbeson

## **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 PAUL J. TRUDEAU**

Paul Trudeau states as follows under penalties of perjury:

- 1. I am the Lead Geotechnical Engineer for the Private Fuel Storage Facility Project with Stone & Webster, Inc.
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Requests for Admission Nos. 2-4, 6, 25-29, 33, 35, and Interrogatory No. 1, Items 1-3, Interrogatory Nos. 2-3, Interrogatory No. 6.
- 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 February 19, 2002.

Paul J. Trudea**u** 

### **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)	Ś	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.
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Requests for Admission Nos. 5, 10, 13-14, 21, 38, and Interrogatory No. 1, Item 4, Interrogatory No. 7, Items 10-11, Interrogatory No. 9, Interregatory No. 11.
- 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 February 19, 2002

Or. Alan Soler

## **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. KRISHNA P. SINGH**

Dr. Krishna P. Singh states as follows under penalties of perjury:

- 1. I am the President and CEO of Holtec International
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Requests for Admission Nos. 5, 10, 13-14, 21, 38, and Interrogatory No. 1, Item 4, Interrogatory No. 7, Items 10-11, Interrogatory No. 9, Interregatory No. 11.
- 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 February 19, 2002

Dr. Krishna P. Singh

## 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 PAUL J. TRUDEAU**

Paul Trudeau states as follows under penalties of perjury:

- 1. I am the Lead Geotechnical Engineer for the Private Fuel Storage Project with Stone & Webster, Inc.
- 2. I am duly authorized to verify Applicant's Objections and Responses to State's Fourteenth Set of Discovery Requests Directed to the Applicant; specifically, Requests for Admission Nos. 2-4, 6, 25-29, 33, 35, and Interrogatory No. 1, Items 1-3, Interrogatory Nos. 2-3, Interrogatory No. 6, Interrogatory No. 14.
- 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 March 7, 2002

Paul J. Trudeau