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STATE OF UTAH



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JAN GRAHAM ATTORNEY GENERAL

CAROL CLAWSON Solicitor General REED RICHARDS Chief Deputy Attorney General

January 9, 1998

OFFICE OF SEC RULEMANNES PAIMER DEPADLIS Chief of Staff

72-22 - 1

Emile L. Julian, Assistant for Rulemakings and Adjudications Rulemakings and Adjudication Staff Office of the Secretary U. S. Nuclear Regulatory Commission 11555 Rockville Pike, One White Flint North Mail Stop: O16G15 Washington, D. C. 20555

Re: In the Matter of Private Fuel Storage, LLC

Dear Mr. Julian:

This office sent to you a pleading entitled "State of Utah's Request for Consideration of Late-Filed Contention GG" dated January 8, 1998. Attached to that pleading under Exhibit 29 was a faxed copy of the Declaration of Lawrence A. White, P.E. Under Exhibit 30 we sent you a faxed copy of the Declaration of Lawrence L. Holish, P. E.

We are enclosing the original of these two documents which will take the place of the faxed copies which were attached to this pleading. Please remove the faxed copies from your file and replace them with the enclosed originals.

Sincerely, lean V. Braxton

Legal Assistant

/kp

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SECY-02

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
PRIVATE FUEL STORAGE, LLC))	Docket No. 72-22-ISFSI
(Independent Spent))	ASLBP No. 97-732-02-ISFSI
Fuel Storage Installation))	

DECLARATION OF LAWRENCE A. WHITE, P.E.

1. I am an Executive Vice President of Versar, Inc., an engineering and consulting firm headquartered in Springfield, Virginia. I have extensive experience in the areas of nuclear licensing and radioactive waste management, including the siting, design, construction, operation, and decommissioning of nuclear facilities. Copies of my resume, which further describes my qualifications, and a description of Versar, Inc., are attached as Exhibit 1 to the contentions filed by the State of Utah in this proceeding on November 23, 1997.

2. I am familiar with Private Fuel Storage's ("PFS's") Safety Analysis Report and the design of the casks that PFS proposes to use at its Private Fuel Storage Facility ("PFSF"). I am also familiar with the seismic analysis prepared by Sierra Nuclear, which is relied on by PFS in support of its license application.

3. I assisted in the preparation of, and have reviewed, the State of Utah's contention regarding Sierra Nuclear Corporation's Proprietary Reports on Seismic Stability and Transtor Storage Casks at the PFS Skull Valley site. The technical facts presented in that contention are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.

Caunare for

Dated this S day of <u>Connany</u>, 1998.

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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)	Docket No. 72-22-ISFSI
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)	ASLBP No. 97-732-02-ISFSI
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DECLARATION OF LAWRENCE L. HOLISH, P.E.

1. I am employed as head of the Engineering Division at Versar, Inc Midwest Regional Office. I have extensive experience in geotechnical engineering and seismic analysis for nuclear power plants and oher facilities. A copy of my resume, which further describes my qualifications, is attached as Exhibit 26 to contentions EE and FF filed by the State of Utah in this proceeding on December 23, 1997.

2. I am familiar with Private Fuel Storage's ("PFS's") Safety Analysis Report and the design of the casks that PFS proposes to use at its Private Fuel Storage Facility ("PFSF"). I am also familiar with the seismic analysis prepared by Sierra Nuclear, which is relied on by PFS in support of its license application.

3. I assisted in the preparation of, and have reviewed, the State of Utah's contention regarding Sierra Nuclear Corporation's Proprietary Reports on Seismic Stability and Transtor Storage Casks at the PFS Skull Valley site. The technical facts presented in that contention are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.

Lawrence L. Holish, P.E. Dated this <u>2⁻</u> day of <u>Jan</u>., 1998.