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STATE OF UTAH

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JAN GRAHAM
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Chief of Staff

October 5, 1998

Emile L. Julian, Assistant for
Rulemakings and Adjudications
Rulemakings and Adjudications 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, Docket 72-22

Dear Mr. Julian;

Enclosed is Dr. Marvin Resnikoff's original Declaration, which had not been available at the time of filing of "State of Utah's Contentions Relating to the Low Rail Transportation License Amendment," dated September 29, 1998. The faxed version of Dr. Resnikoff's Declaration was attached as Exhibit 3 to this pleading.

Please replace the faxed version of this Declaration with the enclosed original Declaration.

Thank you.

Yours truly,

Jean Braxton,
Legal Assistant

Enclosures: as stated

Template = SECY-018

SECY-02

160 East 300 South, 5th Floor, P.O. Box 140873, Salt Lake City, Utah 84114-0873
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UNITED STATES OF AMERICA

BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
PRIVATE FUEL STORAGE, L.L.C.	)	
(Independent Spent Fuel	)	Docket No. 72-22-ISFSI
Storage Installation)	)	
	)	September 29, 1998
	)	

DECLARATION OF DR. MARVIN RESNIKOFF

I, Dr. Marvin Resnikoff, declare under penalty of perjury that:

1. I am the Senior Associate at Radioactive Waste Management Associates, a private consulting firm based in New York City. On November 20, 1997 and January 16, 1998, I prepared declarations which were submitted to the Licensing Board by the State of Utah in support of its contentions regarding Private Fuel Storage, L.L.C.'s proposed Independent Fuel Storage Installation. A statement of my qualifications was attached to November 1997 declaration.

2. I am familiar with Private fuel Storage's ("PFS's") license application and Safety Analysis Report in this proceeding, as well as the nonproprietary versions of applications for the storage and transportation casks PFS plans to use. I am also familiar with NRC regulations, guidance documents, and environmental studies relating to he transportation, storage, and disposal of spent nuclear power plant fuel, and with NRC decommissioning requirements.

3. I assisted in the preparation of, and have reviewed, the State of Utah's Contention B-1, License Needed for Intermodal Transfer Facility. The technical facts presented in the State's Reply regarding those contentions are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.

Dr. Marvin Resnikoff