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OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of) Docket No. 72-22
) ASLPB No. 97-732-02-ISFSI
PRIVATE FUEL STORAGE)
L.L.C.) TELEPHONE DEPOSITION OF:
)
(Private Fuel Storage) <u>KRISHNA P. SINGH</u> and
Facility)) <u>ALAN I. SOLER</u>
)
) (Utah Contention L, Part B)

VOLUME I

Thursday, November 15, 2001 - 2:19 p.m.

Location: Office of the Attorney General
160 East 300 South, 5th Floor
Salt Lake City, Utah

Reporter: Vicky McDaniel
Notary Public in and for the State of Utah

State's
Exhibit 131



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NUCLEAR REGULATORY COMMISSION

Docket No. 72-22 Official Ex. No. State's 131
In the matter of PFS
Staff _____ IDENTIFIED
Applicant _____ RECEIVED
In support of REJECTED _____
Contractor _____ DATE 6-27-02
Other _____ Witness Bartlett
Reporter R. Davis

1 make you sit there while I go through my questions.

2 MR. GAUKLER: That sounds fine.

3 (Recess from 11:53 to 12:06 p.m.)

4 Q. (BY MS. NAKAHARA) Dr. Soler, are you
5 familiar with the term "fragility curves"?

6 A. (DR. SOLER) No, I'm not.

7 Q. Have you determined the probability of an
8 increase in dose as a function of levels of ground
9 motion for the HI-STORM 100 casks at the PFS facility?

10 MR. GAUKLER: Increase in what? I missed
11 one word.

12 Q. An increase in dose at the fence line as a
13 function of levels of ground motion for the HI-STORM
14 100 cask at the PFS facility.

15 A. (DR. SOLER) I have not. That's not in my
16 area of expertise.

17 Q. Do you know if anyone else has developed
18 such a probability analysis?

19 A. (DR. SOLER) I do not know.

20 Q. Okay, thank you. Have you seen any generic
21 documents such as NRC documents which determine the
22 probability of a cask that meets NRC design standards
23 to withstand certain ground motions?

24 A. (DR. SOLER) Have I seen any such documents?

25 Q. Yes, a generic document.