

March 21, 2008

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD**

Before Administrative Judges:

Thomas S. Moore, Chairman
G. Paul Bollwerk, III
E. Roy Hawkens

In the Matter of)	
)	Docket No. PAPO-001
U.S. DEPARTMENT OF ENERGY)	
)	ASLBP No. 08-861-01-PAPO-BD01
(High-Level Waste Repository:)	
Pre-Application Matters, Advisory PAPO)	
Board))	March 6, 2008
)	

**CLARK COUNTY’S RESPONSE TO NOTICE AND MEMORANDUM
REQUESTING INFORMATION FROM POTENTIAL PARTIES**

By Notice and Memorandum dated March 6, 2008, the Advisory Pre-License Application Presiding Officer Board (the “Board”) requested each potential party to provide the Board with information concerning the number of contentions it anticipates filing, the necessary time for filing answers to the contentions filed, and for filing replies to contention challenges.

Clark County, an affected unit of local government pursuant to the Nuclear Waste Policy Act of 1982, and a potential party to the proceeding, hereby informs the Board as follows:

1. Number of Contentions

The Board’s Notice and Memorandum, at II.A.1, requests that each potential party provide its current, best, good-faith estimate of the number of contentions it intends to file. While Clark County is only in the preliminary stages of contention development, its best estimate is that it will file from eleven – twenty-five (11-25) contentions.

2. Answers

Paragraph II.A.2 of the Notice and Memorandum asks parties to estimate the number of days it will need to file reasoned answers to the range of contentions listed in Paragraph II.A.2. Clark County does not anticipate filing a great number of challenges to contentions filed by other parties, and, accordingly, sees no need to extend the time to answer beyond the twenty-five (25) days specified in 10 C.F.R. 2, Appendix D.

3. Replies

Paragraph II.A.2 of the Notice and Memorandum requests each potential intervening party to provide a best, good-faith estimate of the number of days it realistically will need to file replies to the answers. Clark County anticipates that it will need a minimum of twenty (20) days to file replies in defense of its contentions.

4. Request of Information from DOE

Clark County strongly supports the Board's request to DOE, at paragraph II.B, that it file the current draft version of the Table of Contents of its License Application.

Respectfully submitted,

DAVID ROGER
District Attorney

By: /s/
ELIZABETH A. VIBERT
Deputy District Attorney
State Bar No. 003879
Attorney for Clark County, Nevada

Dated at Las Vegas, Nevada
this 21st day of March, 2008