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STATE OF UTAH
OFFICE OF THE ATTORNEY GENERAL



JAN GRAHAM
ATTORNEY GENERAL

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ADJUTANT

JAMES R. SOPER
Solicitor General

REED RICHARDS
Chief Deputy Attorney General

PALMER DEPAULIS
Director of Public Policy & Communications

June 18, 1999

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 -ISFSI

Dear Mr. Julian;

Enclosed are original signed documents (plus two copies of each) which had not been available at the time certain State's pleadings were filed. They are:

1. Declaration of David Larsen, dated April 29, 1999, the faxed version of which was filed with the State of Utah's Amended Responses to Applicant's First Set of Formal Discovery Requests, dated April 29, 1999;
2. Declaration of Dr. Marvin Resnikoff, the faxed version of which was filed with the State of Utah's Motion to Compel Applicant to Respond to State's First Set of Discovery Requests, dated April 30, 1999. There are two Declarations, one to file with the proprietary version of the pleading and one to file with the redacted version;
3. Signature page with Brent Bradford's signature, the faxed version of which was filed with the State of Utah's Second Set of Discovery Requests Directed to the Applicant, dated May 13, 1999. There are two signature pages, one to file with the proprietary version of the pleading and one to file with the redacted version;

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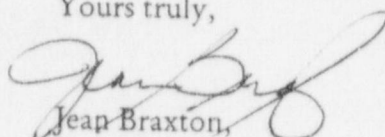
4. Signature page with Brent Bradford's signature, the faxed version of which was filed with the State of Utah's Third Set of Discovery Requests Directed to the Applicant, dated May 18, 1999. There are two signature pages, one to file with the proprietary version of the pleading and one to file with the redacted version;
5. Declaration of Neil Taylor, the faxed version of which was filed with the State of Utah's Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, dated June 4, 1999; and
6. Declarations of David B. Cole, David Larsen, and Bronson W. Hawley, who were not available to sign their Declarations at the time the State of Utah's Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, dated June 4, 1999, was filed.

Please replace the faxed version of these documents with the enclosed original signed documents, and add the Declarations of David B. Cole, David Larsen, and Bronson W. Hawley to the State of Utah's Response to Applicant's Second and Third Sets of Discovery Requests with Respect to Group I Contentions, dated June 4, 1999.

Please contact me with any questions at (801) 366-0287.

Thank you.

Yours truly,


Jean Braxton,
Legal Assistant

Enclosures: as stated

cc: Service List, with documents # 6,
without documents # 1-5.

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CONCLUSION

For the foregoing reasons, the Applicant's objections to the State's first set of discovery requests on Contention C are without merit. Therefore, PFS should be ordered to answer the discovery.

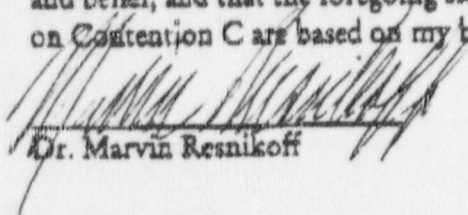
DATED this 30th day of April, 1999.

Respectfully submitted,

Denise Chancellor, Assistant Attorney General
Fred G Nelson, Assistant Attorney General
Diane Curran, Special Assistant Attorney General
Connie Nakahara, Special Assistant Attorney General
Attorneys for State of Utah
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DECLARATION OF DR. MARVIN RESNIKOFF

Under penalty of perjury, I, Dr. Marvin Resnikoff, declare that I am the State's qualified expert with respect to Contention C, that the foregoing factual assertions regarding the nature of and bases for Contention C are true and correct to the best of my knowledge and belief, and that the foregoing statements regarding relevance of the requested discovery on Contention C are based on my best professional judgment.


Dr. Marvin Resnikoff