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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'99 DEC -8 P5:09

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	Docket No. 72-22-ISFSI
PRIVATE FUEL STORAGE, LLC)	ASLBP No. 97-732-02-ISFSI
(Independent Spent Fuel)	
Storage Installation))	December 1, 1999

**STATE OF UTAH'S FIFTH SET OF DISCOVERY REQUESTS
DIRECTED TO THE APPLICANT AND SKULL VALLEY BAND OF
GOSHUTES**
[Redacted Version]

Pursuant to the Board's Orders dated April 22, 1998 (LBP-98-7), and Orders dated June 29, 1998, August 20, 1998, September 20, 1999, and 10 CFR §§ 2.740, 2.741, and 2.742, Intervenor, State of Utah, hereby requests that Private Fuel Storage, LLC ("PFS") answer the following Interrogatories and Requests for Admissions separately, fully, in writing, and under oath within 10 days¹ after service of this discovery request and produce documents requested below within 15 days after service of this request. These discovery requests relate to Utah Contention GG, Failure to Demonstrate Cask-Pad Stability During Seismic Event for TranStor Casks.

¹ Counsel for the State and PFS have agreed that the party responding to Interrogatories and Requests for Admissions during the formal discovery period may timely file a response within eight (8) working days after receipt of the Discovery Request.

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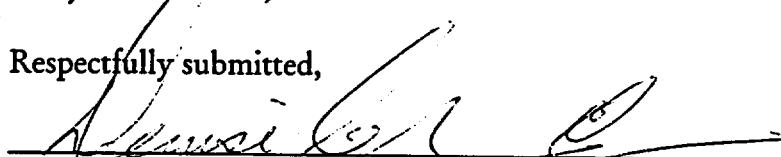
The State has obtained certain information from Holtec International under a confidentiality agreement. The agreement provides that the State may use information obtained under the agreement in an NRC proceeding provided the State files a proprietary pleading relevant to that information. In this discovery request to the Applicant, the State references information obtained under the State-Holtec Confidentiality Agreement. Accordingly, the State files this discovery request as a proprietary pleading; however, the State makes no representation whether or not any of this information should be treated as confidential. The State and the Applicant have agreed that the Applicant will file a justification of the proprietary or confidentiality claim with the Staff or the Board or, alternatively, relinquish its proprietary claim. If the Applicant relinquishes a claim of confidentiality the Applicant will serve the relevant portion of the State's proprietary discovery requests on those parties who are not now being served with the State's proprietary requests.

As noted in the Certificate of Service, the proprietary portion of the State's discovery request will not be served on those parties whom the State understands have not entered into a confidentiality agreement with Holtec International or who are not otherwise privy to this information.

PAGES 3 THROUGH 13 AND PART OF 14 HAVE BEEN REDACTED.

DATED this 1st day of December, 1999.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Denise Chancellor", written over a horizontal line.

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CERTIFICATE OF SERVICE

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I hereby certify that a copy of STATE OF UTAH'S FIFTH SET OF DISCOVERY REQUESTS DIRECTED TO THE APPLICANT AND SKULL VALLEY BAND OF GOSHUTES [*Redacted Version*] was served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class,² this 1st day of December, 1999:

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² Those parties marked with an asterisk are not being served with the paper copy of this redacted pleading.

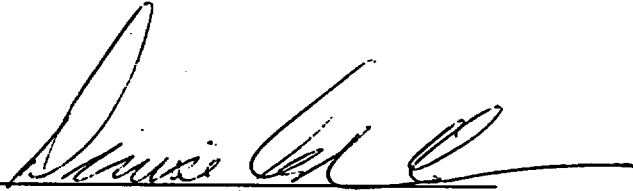
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