

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

PRIVATE FUEL STORAGE, LLC
(Independent Spent Fuel
Storage Installation)

)
)
)
)
)

Docket No. 72-22-ISFSI

ASLBP No. 97-732-02-ISFSI

December 19, 1997

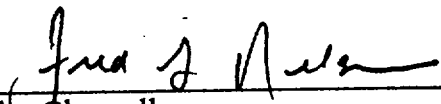
STATE OF UTAH'S RESPONSE TO CONTENTIONS OF
OHNGO GAUDADEH DEVIA, CONFEDERATED TRIBES OF THE
GOSHUTE RESERVATION AND DAVID PETE, AND
CASTLE ROCK LAND & LIVESTOCK, L.C., SKULL VALLEY CO., LTD,
AND ENSIGN RANCHES OF UTAH, L.C.

The State of Utah (State) hereby submits its response to contentions filed by petitioners Ohngo Gaudadeh Devia, Confederated Tribes of the Goshute Reservation and David Pete, and Castle Rock Land & Livestock, L.C., Skull Valley Co., LTD, and Ensign Ranches of Utah, L.C., pursuant to ASLB Order of October 17, 1997, and 10 CFR 2.714(c).

The State supports all the contentions filed by the above-mentioned three petitioners, and specifically adopts as part of its contentions each and every contention filed by Petitioner Castle Rock Land & Livestock, L.C., Skull Valley Co., LTD, and Ensign Ranches of Utah, L.C.

DATED this 19th day of December, 1997

Respectfully submitted,



Denise Chancellor
Fred G Nelson
Assistant Attorneys General
Diane Curran
Connie Nakahara
Special Assistant Attorneys General
Attorneys for State of Utah
Utah Attorney General's Office
160 East 300 South, 5th Floor
P.O. Box 140873
Salt Lake City UT 84114-0873
Telephone: (801) 366-0286
Fax: (801) 366-0293

CERTIFICATE OF SERVICE

I hereby certify that copies of STATE OF UTAH'S RESPONSE TO
CONTENTIONS OF OHNGO GAUDADEH DEVIA, CONFEDERATED
TRIBES OF THE GOSHUTE RESERVATION AND DAVID PETE,
AND CASTLE ROCK LAND & LIVESTOCK, L.C., SKULL VALLEY CO.,
LTD, AND ENSIGN RANCHES OF UTAH, L.C., were served on the persons
listed below by electronic mail (unless otherwise noted) with conforming copies by U.
S. First Class mail as indicated, this 19th day of December, 1997:

Attn: Docketing & Services Branch
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Mail Stop: O16G15
11555 Rockville Pike, One White Flint
North
Rockville, MD 20852-2738
*(Electronic mail via James Cutchin;
original and two conforming copies)*

G. Paul Bollwerk, III, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555
E-Mail: gpb@nrc.gov
(United States mail, first class)

Dr. Jerry R. Kline
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555
E-Mail: jrk2@nrc.gov
(United States mail, first class)

Dr. Peter S. Lam
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555
E-Mail: psl@nrc.gov
(United States mail, first class)

Sherwin E. Turk, Esq.
Catherine L. Marco, Esq.
Office of the General Counsel
Mail Stop - 0-15 B18
U.S. Nuclear Regulatory Commission
Washington, DC 20555
set@nrc.gov
clm@nrc.gov
(United States mail, first class)

Jay E. Silberg, Esq.
Ernest L. Blake, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N. W.
Washington, DC 20037-8007
jay_silberg@shawpittman.com
(United States mail, first class)

Clayton J. Parr, Esq.
Kimball, Parr, Waddoups, Brown &
Gee
185 South State Street, Suite 1300
P. O. Box 11019
Salt Lake City, Utah 84147-0019
karenj@pwlaw.com
(United States mail, first class)

John Paul Kennedy, Sr., Esq.
1385 Yale Avenue
Salt Lake City, Utah 84105
john@kennedys.org
(United States mail, first class)

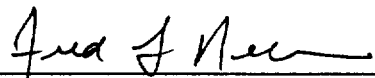
Jean Belille, Esq.
Land and Water Fund of the Rockies
2260 Baseline Road, Suite 200
Boulder, Colorado 80302
landwater@lawfund.org
(United States mail, first class)

Danny Quintana, Esq.
Danny Quintana & Associates, P.C.
50 West Broadway, Fourth Floor
Salt Lake City, Utah 84101
quintana@xmission.com
(United States mail, first class)

Office of the Commission Appellate
Adjudication
Mail Stop: 16-G-15 OWFN
U. S. Nuclear Regulatory Commission
Washington, DC 20555
(United States mail only, first class)

James M. Cutchin
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
E-Mail: jmc3@nrc.gov
(electronic copy only)

Dated this 19th day of December, 1997.



Fred G Nelson
Assistant Attorney General
State of Utah