

EXHIBIT 3

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

PRIVATE FUEL STORAGE L.L.C.)

(Private Fuel Storage Facility))

) Docket No. 72-22 ISFSI
)
)
)

**Affidavit of John D. Parkyn
Pursuant to 10 CFR § 2.790**

CITY OF LA CROSSE)

STATE OF WISCONSIN)

) SS:
)

John D. Parkyn, being duly sworn, states as follows:

1. I am Chairman of the Board of Private Fuel Storage L.L.C. (PFS), a limited liability company organized and existing under the laws of the State of Delaware with its principal office currently located in La Crosse, Wisconsin. In that capacity, I am responsible for the operational and managerial matters of PFS.

2. PFS is providing to Nuclear Regulatory Commission (NRC) staff attorneys copies of various PFS documents as part of the informal discovery process in the proceeding before the Atomic Safety and Licensing Board concerning PFS' application for a license to construct and operate the Private Fuel Storage Facility (PFSF), an independent spent fuel storage installation, on the reservation of the Skull Valley Band

of Goshute Indians. Some of the information contained in the PFS documents provided to the NRC staff attorneys is sensitive proprietary commercial and financial information that could cause great harm to PFS if it were made publicly available. Accordingly, PFS requests the NRC to withhold this sensitive information, developed and owned by PFS, from public disclosure pursuant to 10 CFR 2.790 of its regulations. This affidavit supplies the reasons why this information should be withheld from public disclosure as required by the regulation.

3. The PFS documents containing the sensitive, proprietary commercial and financial information for which PFS requests the Commission to treat as proprietary and to withhold from public disclosure are attached to this affidavit. Each of the documents is prominently stamped with the statement "PFS Confidential Information." These PFS documents are being provided to the NRC staff attorneys only pursuant to discovery in the PFSF licensing proceeding and not for any other reason.

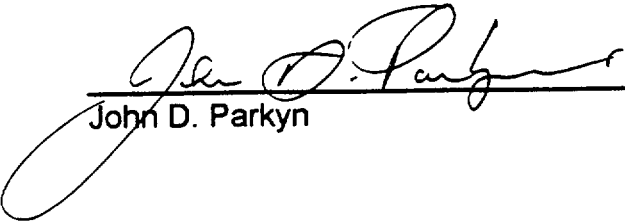
4. I am familiar with the sensitive commercial and financial information contained in the PFS documents attached to this affidavit. I am authorized to speak to PFS' practice of maintaining such information proprietary and the harm that would befall PFS if it were publicly disclosed.

5. The PFS documents attached to this affidavit contain sensitive proprietary information concerning participation of member utilities in the PFS Limited Liability Company (including sensitive private communications with current and prospective PFS members on the terms of participation in PFS and contingency planning). The attached PFS documents also contain sensitive proprietary information concerning the

development and operation of the PFSF (including sensitive proprietary information on the evaluation and selection of alternative sites for the PFSF, a copy of the business lease between PFS and the Skull Valley Band of Goshute Indians, proposed insurance arrangements for the PFSF, sensitive, detailed financial inputs to cost estimates for the PFSF, and purchase orders and change orders for PFS contractor work) as well as confidential PFS Board of Managers meeting minutes and committee reports, and internal drafts of reports and presentations for internal PFS review.

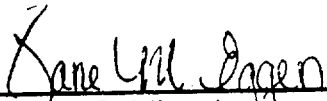
6. The sensitive, proprietary commercial and financial information contained in the documents attached to this affidavit is information of the type customarily held in confidence by PFS, and this information and these documents are so held. PFS does not disclose this type of information to the public and it is not available from public sources. The rational basis for not disclosing this type of information is that the information is commercially sensitive to the conduct of PFS' business, i.e., the development and operation of an independent spent fuel storage facility, and its disclosure to competitors and customers could cause PFS substantial competitive harm. If the information contained in the PFS documents attached to this affidavit became available to PFS' competitors or customers (both current and potential), those parties would learn of sensitive commercial, cost, and financial information which could be used against PFS in the competition for customers or negotiation of contracts for services. Such a result would place PFS at a significant competitive disadvantage in negotiations with potential customers, would provide potential competitors with competitively advantageous information, and cause PFS substantial commercial harm.

7. Accordingly, the PFS documents attached to this affidavit are being transmitted to the Commission in confidence under the provisions of 10 CFR. § 2.790 with the understanding that they and the information they contain will be received and held in confidence by the Commission and withheld from public disclosure.



John D. Parkyn

Sworn to before me this 30th day of October 1998



Notary Public Jane M. Eggen
State of Wisconsin
Commission Expires: 1-24-99