

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

---

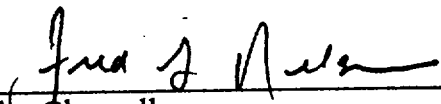
STATE OF UTAH'S RESPONSE TO CONTENTIONS OF  
OHNGO GAUDADEH DEVIA, CONFEDERATED TRIBES OF THE  
GOSHUTE RESERVATION AND DAVID PETE, AND  
CASTLE ROCK LAND & LIVESTOCK, L.C., SKULL VALLEY CO., LTD,  
AND ENSIGN RANCHES OF UTAH, L.C.

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 19<sup>th</sup> 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 19<sup>th</sup> 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)

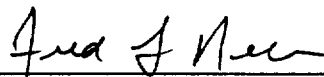
Jean Belille, Esq.  
Land and Water Fund of the Rockies  
2260 Baseline Road, Suite 200  
Boulder, Colorado 80302  
landwater@lawfund.org  
(United States mail, first class)

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 19<sup>th</sup> day of December, 1997.

  
\_\_\_\_\_  
Fred G Nelson  
Assistant Attorney General  
State of Utah