

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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))	November 23, 1997

STATE OF UTAH'S RESPONSE TO
THE CONFEDERATED TRIBES OF THE GOSHUTE
RESERVATION AND DAVID PETE'S PETITION TO
INTERVENE AND REQUEST FOR A HEARING
AND SUPPLEMENTAL MEMORANDUM

The State of Utah supports the Petition to Intervene, and Supplemental Memorandum, filed by the Confederated Tribes of the Goshute Reservation and David Pete ("Goshute Tribe"). The Goshute Tribe has made a concrete and particularized showing of injury and fact in its Petition to Intervene and, in particular, in its Supplemental Memorandum, to satisfy NRC standing requirements. In addition, the Goshute Tribe's interests (e.g., ceremonial sites) may not be adequately represented by the other Petitioners. The State respectfully

requests that the Goshute Tribe be granted standing as a party to intervene in this proceeding.

DATED this 23rd day of November, 1997

Respectfully submitted,

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

Denise Chancellor

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CERTIFICATE OF SERVICE

I hereby certify that copies of STATE OF UTAH'S RESPONSE TO THE CONFEDERATED TRIBES OF THE GOSHUTE RESERVATION AND DAVID PETE'S PETITION TO INTERVENE AND REQUEST FOR A HEARING AND SUPPLEMENTAL MEMORANDUM, 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 23rd day of November, 1997:

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Dated this 23rd day of November, 1997.



Denise Chancellor
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State of Utah