

October 21, 1998

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

**NRC STAFF'S MOTION FOR EXTENSION OF THE PAGE
LIMIT FOR ITS RESPONSE TO THE CONTENTIONS OF THE
CONFEDERATED TRIBES OF THE GOSHUTE RESERVATION
RELATING TO THE LOW RAIL LICENSE AMENDMENT**

Pursuant to the Atomic Safety and Licensing Board's "Memorandum and Order (Memorializing Initial Prehearing Conference Directives)," dated February 2, 1998, the NRC Staff ("Staff") hereby requests a three-page extension of the 10-page limit for filing its response to the "Contentions of the Confederated Tribes of the Goshute Reservation Relating to the Low Rail License Amendment" ("Low Rail Contentions"), filed October 14, 1998. In support of this request, the Staff states as follows:

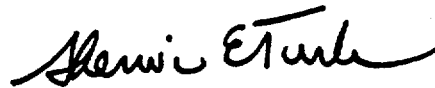
1. In their Low Rail Contentions, the Confederated Tribes set forth six contentions challenging the Applicant's revisions to its license application concerning the construction and operation of a new rail spur and a new location for the Rowley Junction Intermodal Transfer Point (ITP). The Staff's response to those contentions is due to be filed on October 26, 1998.

2. In order to prepare a thorough response to the Confederated Tribes' Low Rail Contentions, the Staff has determined that a total of 13 pages, or three additional pages beyond

the limit established by the Licensing Board, will likely be required for its response. The Staff believes that the instant request is reasonable, in view of the breadth of the Confederated Tribes' Low Rail Contentions and the number of subissues raised therein.

3. Counsel for the Staff has contacted Counsel for the Confederated Tribes and Counsel for the Applicant, neither of whom objects to the instant request for a page extension. Counsel for the Staff has not contacted other parties, inasmuch as those parties did not join in the Confederated Tribes' contentions and do not appear to be affected by this request.

Respectfully submitted,

A handwritten signature in black ink, reading "Sherwin E. Turk". The signature is fluid and cursive, with the first name "Sherwin" and last name "Turk" clearly legible.

Sherwin E. Turk
Counsel for NRC Staff

Dated at Rockville, Maryland
this 21st day of October 1998

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PRIVATE FUEL STORAGE L.L.C.

(Independent Spent
Fuel Storage Installation)

)
)
)
)
)
)

Docket No. 72-22-ISFSI

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S MOTION FOR EXTENSION OF THE PAGE LIMIT FOR ITS RESPONSE TO THE CONTENTIONS OF THE CONFEDERATED TRIBES OF THE GOSHUTE RESERVATION RELATING TO THE LOW RAIL LICENSE AMENDMENT" in the above captioned proceeding have been served on the following through deposit in the Nuclear Regulatory Commission's internal mail system, or by deposit in the United States mail, first class, as indicated by an asterisk, with copies by electronic mail as indicated, this 21st day of October, 1998:

G. Paul Bollwerk, III, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(E-mail copy to GPB@NRC.GOV)

Dr. Jerry R. Kline
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(E-mail copy to JRK2@NRC.GOV)

Dr. Peter S. Lam
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(E-mail copy to PSL@NRC.GOV)

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Office of the Secretary
ATTN: Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(E-mail copy to:
HEARINGDOCKET@NRC.GOV)

Office of the Commission Appellate
Adjudication
Mail Stop: 16-G-15 OWFN
U.S. Nuclear Regulatory Commission
Washington, DC 20555

James M. Cutchin, V
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(by E-mail to JMC3@NRC.GOV)

Danny Quintana, Esq.*
Danny Quintana & Associates, P.C.
50 West Broadway, Fourth Floor
Salt Lake City, UT 84101
(E-mail copy to
quintana@Xmission.com)

Jay E. Silberg, Esq.*
Ernest Blake, Esq.*
Paul A. Gaukler, Esq.*
SHAW, PITTMAN, POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, DC 20037-8007
(E-mail copies to jay_silberg,
paul_gaukler, and ernest_blake
@shawpittman.com)

Denise Chancellor, Esq.*
Fred G. Nelson, Esq.
Utah Attorney General's Office
160 East 300 South, 5th Floor
P.O. Box 140873
Salt Lake City, UT 84114-0873
(E-mail copy to dchancel@State.UT.US)

Connie Nakahara, Esq.*
Utah Dep't of Environmental Quality
168 North 1950 West
P. O. Box 144810
Salt Lake City, UT 84114-4810
(E-mail copy to cnakahar@state.UT.US)

Diane Curran, Esq.*
Harmon, Curran, Spielberg & Eisenberg
2001 S Street, N.W., Suite 430
Washington, D.C. 20009
(E-mail copy to
DCurran.HCSE@zzapp.org)

John A. Kennedy, Sr., Esq.*
1385 Yale Ave.
Salt Lake City, UT 84105
(E-mail copy to john@kennedys.org)

Joro Walker, Esq.*
Land and Water Fund of the Rockies
165 South Main St., Suite 1
Salt Lake City, UT 84111
(E-mail copy to joro61@inconnect.com)

Richard E. Condit, Esq.
Land and Water Fund of the Rockies
2260 Baseline Road, Suite 200
Boulder, CO 80302
(E-mail copy to rcondit@lawfund.org)

Clayton J. Parr, Esq.*
PARR, WADDOUPS, BROWN, GEE
& LOVELESS
185 S. State St., Suite 1300
P.O. Box 11019
Salt Lake City, UT 84147-0019
(E-mail copy to karenj@pwlaw.com)



Sherwin E. Turk
Counsel for NRC Staff