

DONNELL - -

EXHIBIT 2

June 4, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

| | | |
|---------------------------------|---|---------------------------|
| In the Matter of |) | |
| |) | |
| PRIVATE FUEL STORAGE L.L.C. |) | Docket No. 72-22 |
| |) | |
| (Private Fuel Storage Facility) |) | ASLBP No. 97-732-02-ISFSI |

**APPLICANT'S OBJECTIONS AND NON-PRORIETARY RESPONSES
TO STATE'S SECOND REQUESTS FOR DISCOVERY (GROUP I)**

Applicant Private Fuel Storage L.L.C. ("Applicant" or "PFS") files the following objections and responses to "State of Utah's Second Set of Discovery Requests Directed to the Applicant" ("State's Second Discovery Requests"), an electronic copy of which was served on the Applicant on Thursday, May 13, 1999. The Applicant is filing responses to the discovery requests for the Group I contentions, in accordance with the Board's Order dated May 26, 1999, granting extension for such filing to on or before June 4, 1999.¹ Responses to the discovery requests for the Group II and Group III contentions will be filed by June 18, 1999, in accordance with that same Order.²

¹ The following Group I contentions are addressed in this Response: Utah B, Utah K, Utah M, Utah N, Utah R, and Utah Security-C.

² The following Group II and Group III contentions in the State's Second Discovery Requests will be addressed in Applicant's response by June 18, 1999: Utah E, Utah L, Utah S, and Utah DD. The Applicant will, if necessary, file a separate response with respect to those portions of the State's Second Discovery Requests which contain proprietary information, specifically requests concerning Utah Contention E.

For this reason, the PFSF license application addresses both the rail line and intermodal transfer options, and includes an evaluation of the environmental impacts for both options.

B. INTERROGATORIES – Utah Contention B.

INTERROGATORY NO. 4. Describe the operational procedures and the proposed infrastructure at the ITF for the handling of a rail shipment arriving at the ITF for intermodal transfer to the proposed ISFSI that may contain up to five casks, six spacer cars, one crew car and two engines, and also describe the length of the siding required for such a shipment and how the ITF could accommodate such a shipment. *See Response to EIS RAI, "Transportation," Question 1-2 at 1.*

APPLICANT'S RESPONSE: The maximum number of cask cars that would arrive in a rail shipment at the ITP would be three. The reference to trains of "3 to 6 rail cars" in the response to EIS RAI 1-2 refers to the Low Corridor rail line and not the ITP. The operational plan, infrastructure at the ITP, and length of siding, to the extent known, are as follows:

Operational procedures and infrastructure for handling a rail shipment. The operational process for the transfer of sealed spent fuel transportation casks at the ITP as currently planned by PFS, will occur as follows:

1. Receive incoming rail shipment and park on one of two sidings (inbound).
2. Decouple locomotives and either move them to the other siding (outbound) or have them depart the ITP with empty cars previously unloaded.
3. Separate one cask car from the balance of the train and move onto unloading track under gantry crane with small rail switcher.
4. Remove attachment hardware between cask shipping cradle and cradle tie down structure mounted on the railcar bed.
5. Attach lifting rigging / gantry crane hook to cask cradle.

6. Lift entire integral shipment (cask/shipping cradle/impact limiters) a few inches up and off rail car and move over and lower onto heavy haul trailer.
7. Install attachment hardware between cask shipping cradle and cradle tie down structure mounted on heavy haul trailer to secure load.
8. Move heavy haul trailer from ITP to PFSF.
9. Move empty cask rail car from under gantry crane and park on outbound siding.
10. Repeat steps 3 through 9 until all cask rail cars are emptied.

Infrastructure at ITP: The ITP is shown in Figure 3.2-1 of the PFS Environmental Report. The major ITP infrastructure components necessary to handle a rail shipment arriving at the ITP and transfer it to a heavy-haul truck/trailer include: the two rail sidings (inbound and outbound), the single-failure-proof gantry crane, the unloading track that passes under the gantry crane, and the truck access corridor under the gantry crane. The metal weather enclosure over the gantry crane at the ITP is provided only for weather protection of the crane.

Length of the siding. A train consisting of three cask cars, four spacer cars, one security crew car, and two locomotives would be approximately 750 ft. long assuming the length of a cask car is 100 ft., a spacer car is 55 ft., a security crew car is 60 ft., and a locomotive is 85 ft. The shorter of the two sidings will accommodate a total train length of up to 1100 ft. The longer of the two sidings will accommodate a total train length of up to 1400 ft. Both sidings would accommodate the subject train length.

C. DOCUMENT REQUESTS – Utah Contention B

The State requests the Applicant to produce the following documents directly or indirectly within its possession, custody or control to the extent not previously produced by the Applicant during informal discovery: