

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
)
) May 21, 1999

**JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO DISCOVERY REQUESTS
FOR GROUP II AND III CONTENTIONS**

The State and Private Fuel Storage, LLC (PFS) hereby request an extension of time until June 18, 1999 for each party to file discovery responses to Group II and Group II contentions. The State and PFS's last discovery requests to each other were both filed by the close of business on May 18, 1999. The State and PFS have each agreed to respond to all outstanding discovery relating to Group I contentions by the close of the discovery period (*i.e.* May 28, 1999). Responses to Group II and Group III contentions, however, are non-time critical and with the press of other filings and depositions required to be completed this month, the requested extension of time will allow both parties to file more complete responses for Group II and Group III discovery requests.

Both the State and PFS are presently engaged in deposing each other's expert witnesses. This week on Wednesday, Thursday, and Friday, two experts for PFS and

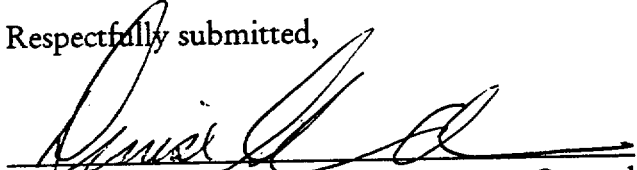
the State's expert Dr. Marvin Resnikoff have been deposed for Utah Contention K and other Group I contentions. Next week PFS will depose at least six State witnesses on Group I contentions and the State will depose a PFS expert on Utah Contention B.

Board approval for the extension of time is necessary because discovery cutoff is presently scheduled for May 28, 1999. Therefore, both the State and PFS request the Board approve responses to outstanding discovery for Group II and Group III contentions be extended to June 18, 1999.

The State attempted to contact counsel for NRC Staff but he is unavailable until Monday. If NRC Staff objects to this motion, the parties or NRC Staff will notify the Board on Monday.

DATED this 21st day of May, 1999.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS FOR GROUP II AND III CONTENTIONS was served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class, this 21st day of May, 1999:

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