

UNITED STATES OF AMERICA
BEFORE THE U.S. NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

_____)	
In the Matter of)	
)	Docket No. 72-22-ISFSI
PRIVATE FUEL STORAGE, L.L.C.)	
(Independent Spent Fuel)	
Storage Installation)	September 13, 1999
_____)	

**REPLY DECLARATION OF DR. MARVIN RESNIKOFF IN SUPPORT OF
STATE OF UTAH'S SECOND AMENDED CONTENTION Q**

1, Dr. Marvin Resnikoff, declare under penalty of perjury that:

1. I am the Senior Associate at Radioactive Waste Management Associates, a private consulting firm based in New York City. I am an expert in the field of nuclear waste transportation, storage, and disposal. A copy of my statement of qualifications was filed on November 20, 1997, as an exhibit to the State of Utah's contentions in this proceeding.

2. I am familiar with Private Fuel Storage's ("PFS's") license application and Safety Analysis Report in this proceeding, as well as the applications for the storage and transportation casks PFS plans to use. I am also familiar with NRC regulations, guidance documents, and environmental studies relating to the transportation, storage, and disposal of spent nuclear power plant fuel, and with NRC decommissioning requirements.

3. On August 20, 1999, I prepared a declaration which was submitted in support of the State of Utah's Request for Admission of Late-Filed Second Amended Contention Q (August 20, 1999). The declaration attested to the fact that the technical facts presented in the contention are true and correct to the best of my knowledge, and that the opinions expressed therein are based on my best professional judgment.

4. I also assisted in the preparation of the State of Utah's Reply to the Applicant's and NRC Staff's Responses to Late-Filed Second Amended Contention Q. The technical

facts presented in that pleading are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.

*Dr. Marvin Resnikoff

September 13, 1999

* Dr. Resnikoff is traveling and unavailable to send his signed Declaration for filing toady. The original will be filed on Dr. Resnikoff's return.