

1 IN THE UNITED STATES OF AMERICA

2 NUCLEAR REGULATORY COMMISSION

3 ***

4 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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6 In Matter of: : Docket No. 72-22

7 PRIVATE FUEL STORAGE, L.L.C : ASLBP No.

8 (Private Fuel Storage Facility) : 97-732-02-ISFI

9 - - - - -x

10
11 Washington, D.C.

12 Wednesday, May 19, 1999

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14 Deposition of MARVIN RESNIKOFF, was called
15 for examination by counsel, commenced pursuant to
16 notice, at 10:10 a.m., at the offices of Shaw,
17 Pittman, Potts & Trowbridge, 2300 N Street, NW,
18 Washington, D.C., before Karen K. Brynteson,
19 Registered Professional Reporter and Notary Public.

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22
ANN RILEY & ASSOCIATES, LTD.
Court Reporters

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1 A Yes.

2 Q And what is your basis for trying to apply
3 it to commercial as well?

4 A Because it is my understanding that most
5 accidents take place while during takeoffs and
6 landings, and not during flights. If I were to take
7 into account flights, I would have to take into
8 account all the flights in the country, not just
9 those at Salt Lake City.

10 And I was using that kind of statistic, so
11 I would focus more on the number of accidents that
12 take place within a certain radius of an airport per
13 year. I would focus on that statistic because that
14 seems to capture the truth of what is happening
15 here.

16 Q I have two questions based upon your last
17 answer. First of all, what statistics do you have
18 with respect to radius, accidents within a 45 mile
19 radius of an airport, beyond 45 miles? Would that
20 be beyond the radius that you would consider to be
21 significant, more than 45 miles from the airport?

22 A I don't know the answer to that question.