UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	Docket No. 72-22-ISFSI
PRIVATE FUEL STORAGE, LLC (Independent Spent Fuel Storage Installation)	)	ASLBP No. 97-732-02-ISFSI
	)	May 20, 1999

STATE OF UTAH'S THIRD SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF FORMAL DISCOVERY REQUESTS

The State of Utah supplements its April 14, 1999, April 29, 1999, and May 12, 1999 responses to the Applicant's First Set of Formal Discovery Requests ("Applicant's Discovery Requests"). This response supplements the State's responses to General Interrogatory No. 3.

GENERAL INTERROGATORY NO. 3. For each admitted Utah contention, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom the State expects to call as a witness at the hearing. For purposes of answering this interrogatory, the educational and scientific experience of expected witnesses may be provided by a resume of the person attached to the response.

STATE'S SUPPLEMENTAL RESPONSE TO GENERAL INTERROGATORY NO. 3.

The following are additional witnesses the State expects to call at the hearing:

Utah Contention K - Inadequate Consideration of Credible Accidents
Donald Verbica, Jr., Section Manager
Division of Solid and Hazardous Waste
Utah Department of Environmental Quality
288 North 1460 West
Salt Lake City, Utah 84116

Martin Delmar Gray, Section Manager
Division of Solid and Hazardous Waste
Utah Department of Environmental Quality
288 North 1460 West
Salt Lake City, Utah 84116

Marvin Resnikoff, PhD, Senior Associate
Radioactive Waste Management Associates
526 West 26th Street, Room 517
New York, NY 10001

Utah Contention R - Emergency Plan
Gary Alan Wise, State Fire Marshal
Utah Department of Public Safety
5272 South College Drive, Suite 302
Murray, Utah 84123-261

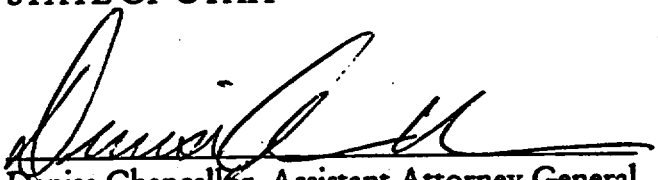
Utah Contention Security-A, B, C - Safeguards
Mark Millett, Lieutenant
Section 12/13
Bureau IV, Motor Carrier Safety & Inspection Bureau
Utah Highway Patrol
5500 W. Amelia Earhart Drive
Salt Lake City, Utah 84116

Attached is Donald Verbica's resume. Resumes for Martin D. Gray, Gary A. Wise, and Mark Millett will be provided as soon as they are available. Dr. Marvin Resnikoff's resume has already been provided in this proceeding.

DATED this 20th day of May, 1999.

Respectfully submitted,

STATE OF UTAH



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DONALD G. VERBICA
Manager, Commercial\Federal Facility Section
Utah Division of Solid andHazardous Waste
288 North 1460 West
Salt Lake City, Utah 84114-4880

EDUCATION Brigham Young University, Provo, Utah. Bachelor degree in Geology, 1982.

EXPERIENCE

Dec 1983 - present Utah Division of Solid and Hazardous Waste. Served in various positions. Currently serving as Section Manager for the Commercial\Federal Facility Section. The main functions of the Commercial/Federal Facility section are to perform permitting activities and to evaluate compliance for the commercial and selected federal facilities. When permit modifications are requested, the section evaluates them and determines if they are appropriate/complete or if they need revisions. Any construction is also evaluated to ensure that it was completed as required by the permit. Where deviation from the permit or rules are documented, appropriate enforcement responses are selected and implemented to ensure compliance.

CERTIFICATE OF SERVICE

I hereby certify that a copy of STATE OF UTAH'S THIRD SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF FORMAL DISCOVERY REQUESTS was served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class, this 20th day of May, 1999:

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