

May 18, 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 FIRST SET OF  
INTERROGATORIES TO INTERVENOR OGD

Applicant Private Fuel Storage L.L.C. ("Applicant" or "PFS") hereby propounds  
the following interrogatories to intervenor OGD.

General Definitions and Instructions

1. The term "document" means the complete original or a true, correct, and complete copy and any non-identical copies, whether different by reason of any notation or otherwise, of any written or graphic matter of any kind, no matter how produced, recorded, stored, or reproduced (including electronic, mechanical or electrical records or representation of any kind) including, but not limited to, any writing, letter, telegram, meeting minute or note, memorandum, statement, book, record, survey, map, study, handwritten note, working paper, chart, tabulation, graph, tape, data sheet, data processing card, printout, microfilm or microfiche, index, diary entry, note of interview

or communication, or any data compilation including all drafts of all such documents.

The phrase "data compilation" includes, but is not limited to, any material stored on or accessible through a computer or other information storage or retrieval system, including videotapes and tape recordings.

2. "OGD" means Ohngo Gaudadeh Devia, any of its officials, directors, agents, employees, representatives, and attorneys.

3. "Consultant" means any person who provides professional or technical input, advice and/or opinion to OGD whether that person is employed specifically for this case or is a regular OGD employee or official.

4. The PFS ISFSI means the Private Fuel Storage Facility.

## **INTERROGATORIES**

**INTERROGATORY NO. 1.** State the name, business address, and job title of each person who was consulted and/or who supplied information for responding to interrogatories, requests for admissions and requests for the production of documents. Specifically note for which interrogatories, requests for admissions and requests for production each such person was consulted and/or supplied information.

If the information or opinions of anyone who was consulted in connection with your response to an interrogatory or request for admission differs from your written answer to the discovery request, please describe in detail the differing information or

opinions, and indicate why such differing information or opinions are not your official position as expressed in your written answer to the request.

**INTERROGATORY NO. 2.** Please provide the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom OGD expects to call as a witness or expert witness at the hearing and the subject matter about which each witness or expert witness will testify. For each expert witness please include a list of all publications authored by the witness within the preceding ten years and a listing of any other cases in which the witness has testified as an expert at a trial, hearing or by deposition within the preceding four years. Please describe the subject matter on which each of the witnesses is expected to testify at the hearing by detailing the facts and opinions to which each witness is expected to testify, including a summary of the grounds for each opinion, and identify the documents (including all pertinent pages or parts thereof), data or other information which each witness has reviewed and considered, or is expected to consider or to rely on for his or her testimony.

**INTERROGATORY NO. 3.** Identify and fully describe the specific disproportionately high and adverse economic and sociological impacts that OGD contends the construction, operation, and decommissioning of the PFS ISFSI will have on the community of the Skull Valley Band of Goshute Indians and describe fully the scientific, technical and sociological bases therefor.

**INTERROGATORY NO. 4.** Identify and fully describe the specific causal links between the impacts asserted in response to Interrogatory No. 3 and the specific construction, operation, or decommissioning activities associated with the PFS ISFSI, and the scientific, technical, or sociological bases therefor.

**INTERROGATORY NO. 5.** Identify and fully describe the impacts asserted in response to Interrogatory No. 3 to which OGD contends the Skull Valley Band of Goshute Indians are particularly susceptible, the specific factors peculiar to the Band that assertedly make them so susceptible, and the scientific, technical, or sociological bases for such susceptibility.

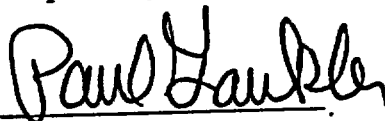
**INTERROGATORY NO. 6.** Identify and fully describe each of the specific environmental impacts of materials and activities at, or emanating from, the facilities enumerated in Contention OGD O<sup>1</sup> that OGD asserts would be cumulative with the environmental impacts of the construction, operation, or decommissioning of the PFS ISFSI, including the specific magnitude of the asserted impacts at the Skull Valley Reservation from the enumerated facilities and the ISFSI, the scientific and technical basis for each asserted specific impact at the Skull Valley Reservation, and the cumulative nature of the impacts.

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<sup>1</sup> Those facilities are: 1) Dugway Proving Ground, 2) Deseret Chemical Depot (including CAMDS and the TOCDF chemical weapons incinerators), 3) Tooele Army Depot, North Area, 4) Envirocare mixed waste and low-level waste landfill, 5) Clive hazardous waste storage facility, 6) Aptus hazardous waste incinerator, and 7) Grassy Mountain hazardous waste landfill

**INTERROGATORY NO. 7.** Identify and fully describe the specific impacts that OGD contends that the construction, operation, and decommissioning of the PFS ISFSI will have on property values in and around the community of the Skull Valley Band of Goshute Indians, including the specific parcels of property that will assertedly be affected, the current value of those parcels, the specific changes in their asserted values that would be caused by the construction and operation of the ISFSI, and the factual or other bases for claiming that such impacts will occur.

Respectfully submitted,



Jay E. Silberg

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Paul A. Gaukler

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Dated: May 18, 1999

Counsel for Private Fuel Storage L.L.C.

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**NUCLEAR REGULATORY COMMISSION**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the "Applicant's First Set of Interrogatories to Intervenor OGD" were served on the persons listed below (unless otherwise noted) by e-mail with conforming copies by U.S. mail, first class, postage prepaid, this 18th day of May 1999.

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