

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 SUWA**

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

General Definitions and Instructions

1. "SUWA" means the Southern Utah Wilderness Alliance, any of its officials, directors, agents, employees, representatives, and attorneys.
2. "Consultant" means any person who provides professional or technical input, advice and/or opinion to SUWA whether that person is employed specifically for this case or is a regular SUWA employee or official.
3. The "Low Corridor rail line" means the rail line that PFS has proposed in its License Amendment of August 28, 1998 to construct and operate a rail line running



from Low, Utah (on the main Union Pacific rail line near Interstate 80) to the PFS site on the Skull Valley reservation.

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 SUWA 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 each alternative to the proposed alignment of the Low Corridor rail line that SUWA asserts would have fewer or less severe environmental impacts than the alignment now proposed by PFS, including the precise alignment of each proposed alternative, and the scientific and technical bases for SUWA's position.

INTERROGATORY NO. 4. For each alternative identified by SUWA, identify and fully describe each environmental impact that SUWA asserts PFS's proposed rail alignment would have that SUWA's rail alignment alternative would not have, the specific environmental impacts associated with SUWA's alternative that PFS's proposed rail alignment would not have, and the scientific and technical bases therefor.

INTERROGATORY NO. 5. Identify and fully describe the feasibility of building and using, for the shipment of spent fuel transportation casks, each of the rail line alignment alternatives identified by SUWA in Interrogatory No. 3, and the scientific, technical and engineering bases therefor.

INTERROGATORY NO. 6. Identify and fully describe the cost to build and maintain each of the rail line alignment alternatives identified by SUWA in Interrogatory No. 3, along with the factual and any other bases supporting SUWA's estimates of those costs.

Respectfully submitted,



Jay E. Silberg

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Dated: May 18, 1999

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Applicant's First Set of Interrogatories to Intervenor SUWA" 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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Attention: Rulemakings and Adjudications
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* Adjudicatory File
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* By U.S. mail only


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