

May 13, 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 DOCUMENT REQUESTS
TO INTERVENOR SUWA

Applicant Private Fuel Storage L.L.C. ("Applicant" or "PFS") hereby makes the following formal document requests of SUWA.

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. "SUWA" means the Southern Utah Wilderness Alliance, any of its officials, directors, agents, employees, representatives, and its attorneys.

3. "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.

4. 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.

I. Contention SUWA B Alignment Alternatives to the Low Junction Rail Line

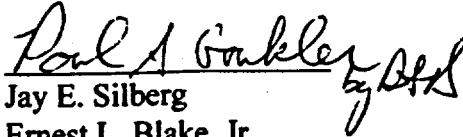
A. Document Requests – SUWA B

The Applicant requests SUWA to produce the following documents directly or indirectly within its possession, custody or control:

1. All documents related to the claims raised by SUWA in Contention SUWA B, as admitted by the Board.

2. All documents, data or other information generated, reviewed, considered or relied upon by any expert or consultant assisting SUWA with respect to SUWA B.
3. All calculations, studies, evaluations, analyses or other documents relating to the environmental impacts of the Low Corridor rail line in its alignment as proposed by PFS.
4. All documents identifying any alternatives proposed or endorsed by SUWA to PFS's proposed alignment of the Low Corridor rail line.
5. All documents identifying the ownership of the land that would be traversed by the alternatives proposed or endorsed by SUWA to PFS's proposed alignment of the Low Corridor rail line.
6. All calculations, studies, evaluations, analyses or other documents relating to the environmental impacts of any potential alignment of the Low Corridor rail line other than that proposed by PFS.
7. All documents relating to the environmental impacts of any alternatives to PFS's 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.
8. All documents concerning the scientific, technical, or engineering feasibility of building and using, for the shipment of spent fuel transportation casks, each of the alternative rail line alignments for the Low Corridor rail line that SUWA asserts would have fewer or less severe environmental impacts than the alignment now proposed by PFS.
9. All documents concerning the cost to build and maintain each of the alternative alignments for the Low Corridor rail line that SUWA asserts would have fewer or less severe environmental impacts than the alignment now proposed by PFS, including those documents providing the factual basis supporting SUWA's estimates of those costs.

Respectfully submitted,



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Paul A. Gaukler

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Dated: May 13, 1999

Counsel for Private Fuel Storage L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Applicant's First Set of Document Requests 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 13th day of May 1999.

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Attention: Rulemakings and Adjudications
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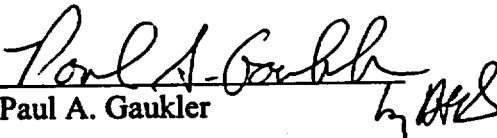
* Adjudicatory File
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
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