

**Exhibit 1**

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

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)  
)  
)  
)  
)

Docket No. 72-22-ISFSI

ASLBP No. 97-732-02-ISFSI

June 25, 1999

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DECLARATION OF M. LEE ALLISON, Ph.D.

I, M. Lee Allison, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, relating to Utah Contention L, limited to Responses to Admission Requests Nos. 1 through 4, and the Geomatrix Study, in particular to Interrogatory Responses Nos. 1, 2, and part of 5, are true and correct to the best of my knowledge, information and belief.

Executed this 25th day of June, 1999.

By:



M. Lee Allison, Ph.D.  
Director  
Utah Geological Survey  
Utah Department of Natural Resources

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)  
) Docket No. 72-22-ISFSI  
)

) ASLBP No. 97-732-02-ISFSI  
)

) June 24, 1999  
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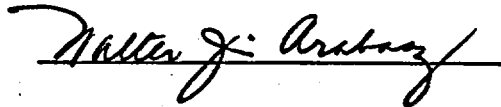
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DECLARATION OF DR. WALTER J. ARABASZ

I, Dr. Walter J. Arabasz, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to Interrogatories Nos. 3 and 4 for Utah Contention L and responses to document requests relating thereto.

Dated this 24th day of June, 1999.

By:



Walter J. Arabasz, PhD  
Research Professor of Geology and Geophysics,  
University of Utah;  
Director, University of Utah Seismograph Stations

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

**June 23, 1999**

**Steven F. Bartlett, Ph.D., P.E.**  
**Research Project Manager, Research Division**  
**Utah Department of Transportation**

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)  
) Docket No. 72-22-ISFSI  
)

) ASLBP No. 97-732-02-ISFSI  
)

) June 28, 1999  
)

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DECLARATION OF DENISE CHANCELLOR, ESQ.

I, Denise Chancellor, Esq., declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to responses to General Discovery Requests and Document Requests for Contention W.

Executed this 28th day of June, 1999.

By: 

Denise Chancellor, Esq.  
Assistant Attorney General  
Utah Attorney General's Office

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)  
) Docket No. 72-22-ISFSI  
)  
) ASLBP No. 97-732-02-ISFSI  
)  
) June 17, 1999


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DECLARATION OF CHRIS S. CRNICH, DVM

I, Chris S. Crnich, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 28, 1999, relating to Utah Contention DD, limited to livestock and farm produce, are true and correct to the best of my knowledge, information and belief.

Executed this 17th day of June, 1999.

By: \_\_\_\_\_

  
Chris S. Crnich, DVM  
Manager  
Meat and Poultry Inspection Bureau  
Utah Department of Agriculture

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

)  
) Docket No. 72-22-ISFSI  
)

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

) ASLBP No. 97-732-02-ISFSI  
)  
) June 16, 1999  
)

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DECLARATION OF MERTON A. FRANKLIN

I, Merton A. Franklin, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 25, 1999, relating to Utah Contention DD, limited to Pohl's milkvetch and small spring parsley, are true and correct to the best of my knowledge, information and belief.

Executed this 16th day of June, 1999.

By:

Merton A. Franklin

Merton A. Franklin  
Botanist  
Utah Natural Heritage Program  
Utah Division of Wildlife Resources  
Utah Department of Natural Resources

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)  
) Docket No. 72-22-ISFSI  
)

) ASLBP No. 97-732-02-ISFSI  
)

) June 16, 1999  
)  

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DECLARATION OF DR. FRANK P. HOWE

I, Dr. Frank P. Howe, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 18, 1999, relating to Utah Contention DD, limited to peregrine falcons, are true and correct to the best of my knowledge, information and belief.

Executed this 16th day of June, 1999.

By:



Frank P. Howe, PhD  
Non-Game Avian Program Coordinator  
Utah Division of Wildlife Resources  
Utah Department of Natural Resources



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NUCLEAR REGULATORY COMMISSION

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

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)  
)  
)  
)

Docket No. 72-22-ISFSI

ASLBP No. 97-732-02-ISFSI

June 24, 1999

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DECLARATION OF JERRY D. OLDS, P.E.

I, Jerry D. Olds, P.E., hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to responses for Utah Contention O (Admission Request Nos. 1 and 2, and part of Interrogatory No. 7 - water usage); and corresponding responses to document requests.

Executed this 24rd day of June, 1999.

By:

Jerry D. Olds

Jerry D. Olds, P.E.,  
Assistant State Engineer,  
Division of Water Rights  
Utah Department of Natural Resources

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)  
) Docket No. 72-22-ISFSI  
)

) ASLBP No. 97-732-02-ISFSI  
)

) June 16, 1999  
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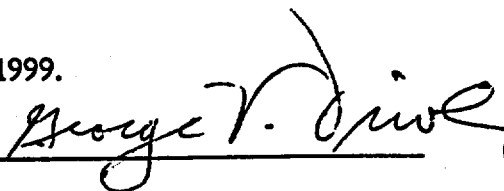
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DECLARATION OF GEORGE V. OLIVER

I, George V. Oliver, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 18, 1999, relating to Utah Contention DD, limited to pocket gophers, are true and correct to the best of my knowledge, information and belief.

Executed this 16th day of June, 1999.

By: \_\_\_\_\_



George V. Oliver  
Chief Zoologist  
Utah Natural Heritage Program  
Utah Division of Wildlife Resources  
Utah Department of Natural Resources

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

)  
) Docket No. 72-22-ISFSI  
)

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

) ASLBP No. 97-732-02-ISFSI  
)  
) June 15, 1999

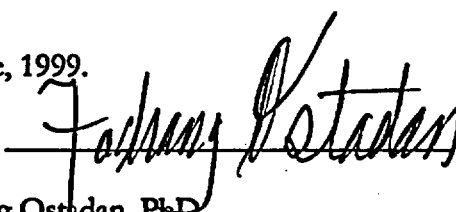
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**DECLARATION OF DR. FARHANG OSTADAN**

I, Dr. Farhang Ostadan, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 18, 1999, relating to Utah Contentions L and GG, limited to soil dynamics and soil-structure interaction, are true and correct to the best of my knowledge, information and belief.

Executed this 15th day of June, 1999.

By:

  
Farhang Ostadan, PhD  
Consultant for Soil Dynamics and Soil Structure  
Interaction

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

)  
) Docket No. 72-22-ISFSI  
)

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

) ASLBP No. 97-732-02-ISFSI  
)  
) June 23, 1999

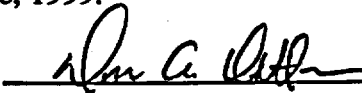
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**DECLARATION OF DON A. OSTLER, P.E.**

I, Don A. Ostler, P.E., hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in State of Utah's Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to responses for Utah Contention O (with the exception of water usage ) and corresponding responses to document requests.

Executed this 23rd day of June, 1999.

By: \_\_\_\_\_



Don A. Ostler, P.E.  
Director, Division of Water Quality  
Department of Environmental Quality

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:	)	Docket No. 72-22-ISFSI
	)	
PRIVATE FUEL STORAGE, LLC	)	ASLEP No. 97-732-02-ISFSI
(Independent Spent Fuel	)	
Storage Installation)	)	June 24, 1999

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**DECLARATION OF DR. MARVIN RESNIKOFF**

I, Dr. Marvin Resnikoff, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, to be filed on June 28, 1999, are true and correct to the best of my knowledge, information and belief, as they relate to Utah Contentions H, U, and V; and with respect to Utah Contentions E and S, limited to worst case accident scenarios.

Dated this 24th day of June, 1999.

By: 

Marvin Resnikoff, PhD,  
Senior Associate  
Radioactive Waste Management Associates

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)  
) Docket No. 72-22-ISFSI  
)

) ASLBP No. 97-732-02-ISFSI  
)

) June 18, 1999  
)

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DECLARATION OF DAVID A. SCHLISSEL

I, David A. Schlissel, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 28, 1999, relating to Utah Contentions E, S, Z, and AA, are true and correct to the best of my knowledge, information and belief.

Executed this 18th day of June, 1999.

By:

David A. Schlissel

David A. Schlissel  
President  
Schlissel Technical Consulting, Inc.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

)

) Docket No. 72-22-ISFSI

)

PRIVATE FUEL STORAGE, LLC  
(Independent Spent Fuel  
Storage Installation)

)

) ASLBP No. 97-732-02-ISFSI

)

) June 21, 1999

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DECLARATION OF MICHAEL F. SHEEHAN, Ph.D.

I, Michael F. Sheehan, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the statements contained in State of Utah's Objections and Response to Applicant's Second Set of Discovery Requests with Respect to Groups II and III Contentions, dated June 28, 1999, relating to Utah Contentions E, S, Z, and AA, are true and correct to the best of my knowledge, information and belief.

Executed this 21st day of June, 1999.

By:



Michael F. Sheehan, Ph.D.  
Osterberg & Sheehan