

August 10, 2000

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-ISFSI
	)	
(Independent Spent	)	
Fuel Storage Installation)	)	

NRC STAFF'S MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO "STATE OF UTAH'S REQUEST FOR ADMISSION  
OF LATE-FILED CONTENTIONS UTAH LL THROUGH OO"

Pursuant to 10 C.F.R. § 2.730, the NRC Staff ("Staff") hereby requests a nine-day extension of time, until August 25, 2000, in which to file its response to the "State of Utah's Request for Admission of Late-Filed Contentions Utah LL Through OO (Relating to the DEIS's analysis of spent fuel transportation risks)," filed on August 2, 2000. In support of this request, the Staff states as follows:

1. The State of Utah ("State") filed its request for admission of late-filed Contentions Utah LL-OO on August 2, 2000. Pursuant to the Licensing Board's "Order (Scheduling/ Administrative Matters)" ("Order") of August 4, 2000, responses to Late-Filed Contentions Utah LL-OO are due to be filed on or before August 16, 2000.

2. In its late-filed contentions, the State raises numerous complex issues related to the environmental impacts of spent fuel transportation to the independent spent fuel storage installation proposed by Private Fuel Storage, L.L.C. ("PFS" or "Applicant"), based on the Staff's recent publication of its Draft Environmental Impact Statement ("DEIS") concerning the PFS license application. The Staff has commenced its review of these

contentions, and has determined that it requires the assistance of several Staff personnel who were involved in preparing the DEIS's transportation impact analysis.

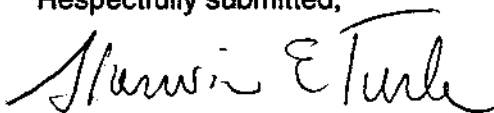
3. Due to previously scheduled meetings concerning transportation and other issues in Rockville, MD, and Las Vegas and Parumph, NV, two members of the Staff whose assistance is necessary for preparation of a response to these contentions are unavailable before Friday, August 18, 2000. In addition, Counsel for the Staff will be unavailable to consult with these persons during a portion of the following week due to previously scheduled travel plans, including attendance at an additional DEIS public comment meeting scheduled to be held in Salt Lake City, Utah.

4. In light of these schedule conflicts and personnel unavailability, and the considerable time required for the Staff to review and respond to Late-Filed Contentions Utah LL-OO, the Staff has determined that it requires an extension of time until Friday, August 25, 2000, to prepare its response to the contentions. The Staff believes that this requested nine-day extension of time will not adversely affect the schedule for litigation of any other contentions in this proceeding.

5. Staff Counsel has contacted Counsel for the Applicant and Counsel for the State. Neither of those parties objects to the Staff's request for an extension of time, although Counsel for the Applicant requests that it be afforded a similar extension of time to file its response to these contentions, due to previously scheduled travel plans. The Staff does not oppose the Applicant's request for a similar extension of time; Counsel for the State has indicated that she opposes the Applicant's request.

WHEREFORE, the Staff hereby requests a nine-day extension of time, until August 25, 2000, for the filing of its response to Late-Filed Contentions LL-OO.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sherwin E. Turk". The signature is written in dark ink and is positioned above the printed name and title.

Sherwin E. Turk  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 10th day of August 2000

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NUCLEAR REGULATORY COMMISSION

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In the Matter of

PRIVATE FUEL STORAGE L.L.C.

(Independent Spent  
Fuel Storage Installation)

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Docket No. 72-22-ISFSI

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO 'STATE OF UTAH'S REQUEST FOR ADMISSION OF LATE-FILED CONTENTIONS UTAH LL THROUGH OO'" in the above captioned proceeding have been served on the following through deposit in the NRC's internal mail system, with copies by electronic mail, as indicated by an asterisk, or by deposit in the U.S. Postal Service, as indicated by double asterisk, with copies by electronic mail this 10<sup>th</sup> day of August, 2000:

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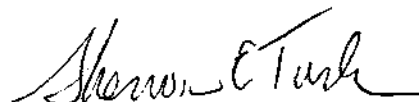
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