

December 4, 2001

Denise Chancellor, Esq.
Utah Attorney General's Office
160 East 300 South, 5th Floor
P.O. Box 140873
Salt Lake City, Utah 84114-0873

In the Matter of
Private Fuel Storage, L.L.C.
(Independent Spent Fuel Storage Installation)
Docket No. 72-22-ISFSI

Dear Ms. Chancellor:

I am transmitting herewith the "NRC Staff's Supplemental Responses to the 'State of Utah's Twelfth Set of Discovery Requests Directed to the NRC Staff,'" dated September 18, 2001, in accordance with the Licensing Board's "Memorandum and Order (Ruling on Motion to Compel)" ("Order"), dated November 27, 2001.

In our telephone conversation yesterday, I stated my belief that no further response is required to the State of Utah's Document Requests Nos. 10 and 11, inasmuch as the State is aware of the names of PFS's experts, thus rendering these requests moot -- as the Licensing Board has stated. See Order at 5, n.5. Nonetheless, at your further request, I have verified that, to the best of the Staff's knowledge, information and belief, the only person affiliated with PFS to whom the Staff or its contractor (ICF Incorporated) may have sent documents related to the rulemaking effort was Dr. C. Allin Cornell.

At my request, Dr. Cornell has transmitted to me copies of the rulemaking-related documents which he (a) provided to PFS or its attorneys, or (b) relied upon in formulating his expert opinion regarding the PFS seismic exemption request. I am reviewing those documents and will provide copies to you later this week, except insofar as document(s) he relied upon may be withheld as privileged.

Sincerely,

/RA/

Sherwin E. Turk
Counsel for NRC Staff

cc: Service List