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OFFICE OF THE SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

PAUL A. GAUKLER, ESQ.  
(202) 663-8304

November 19, 2001

By Electronic Filing and U.S. Mail

Emile L. Julian  
Assistant for Rulemakings and Adjudications  
Rulemakings and Adjudications Staff  
Office of the Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
11555 Rockville Pike, One White Flint North  
Rockville, MD 20852-2738  
Attn: Docketing & Services Branch

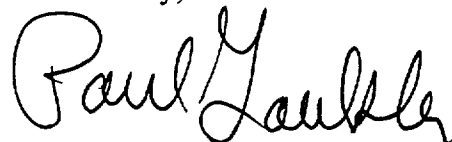
**Re: Private Fuel Storage – Docket No. 72-22 – ASLBP No. 97-732-02**

To the Secretary of the Commission:

Enclosed please find the originals to replace the faxed copies of the Declarations of Alan I. Soler, Everett L. Redmond II, and C. Allin Cornell filed with respect to Applicant's Objections and Responses to the State of Utah's Thirteenth Set of Discovery Requests Directed to the Applicant.

If you have any questions, please contact me at (202) 663-8304.

Sincerely,



Paul A. Gaukler

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SECY-02

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Emile L. Julian  
November 19, 2001  
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cc: G. Paul Bollwerk III, Esq. (w/o encls.)  
Dr. Jerry R. Kline (w/o encls.)  
Dr. Peter S. Lam (w/o encls.)  
Sherwin Turk, Esq. (w/o encls.)  
Denise Chancellor, Esq. (w/o encls.)  
Office of Appellate Adjudication (by mail only) (w/o encls.)  
Adjudicatory File, Atomic Safety and Licensing Board Panel (by mail only) (w/o encls.)  
Diane Curran, Esq. (w/o encls.)  
David W. Tufts, Esq. (w/o encls.)  
Tim Vollmann, Esq. (w/o encls.)  
Joro Walker, Esq. (w/o encls.)  
Paul EchoHawk, Esq. (w/o encls.)  
Richard E. Condit, Esq. (by mail only) (w/o encls.)

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**Before the Atomic Safety And Licensing Board**

<b>In the Matter of</b>	)	
	)	
<b>PRIVATE FUEL STORAGE L.L.C.</b>	)	<b>Docket No. 72-22</b>
	)	
<b>(Private Fuel Storage Facility)</b>	)	<b>ASLBP No. 97-732-02-ISFSI</b>

**DECLARATION OF DR. C. ALLIN CORNELL**

Dr. C. Allin Cornell states as follows under penalties of perjury:

1. I am a Professor at Stanford University California and an independent engineering consultant. I am a consultant to Private Fuel Storage, L.L.C.
2. I am duly authorized to verify Applicant's Response to State of Utah's Thirteenth Requests for Discovery; specifically, Request for Admission Nos. 12-21 and Interrogatory Nos. 17 and 19.
3. I certify that the statements and opinions in such responses are true and correct to the best of my personal knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2001.

  
\_\_\_\_\_  
Dr. C. Allin Cornell

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

**DECLARATION OF DR. EVERETT L. REDMOND II**

Dr. Everett L. Redmond II states as follows under penalties of perjury:

1. I am a Principal Engineer and Manager of the Nuclear Physics Department with Holtec International. I am responsible for all shielding, criticality, and confinement analysis work related to Holtec's dry cask storage systems, and in particular for the site-specific shielding analyses in support of deployment of the HI-STORM 100 Cask System at the PFSF ISFSI.
2. I am duly authorized to verify Applicant's Response to State's Thirteenth Set of Discovery Requests to Applicant; specifically, Request for Admission No. 4 and Interrogatory No. 18, as they relate to radiation doses at the site boundary.
3. I certify that the statements and opinions in such responses are true and correct to the best of my personal knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2001

  
\_\_\_\_\_  
Dr. Everett L. Redmond II

**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

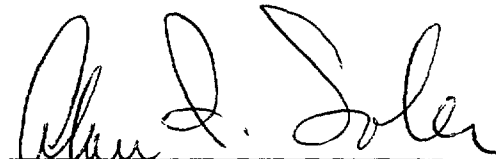
**DECLARATION OF DR. ALAN I. SOLER**

Dr. Alan Soler states as follows under penalties of perjury:

1. I am an Executive Vice-President with Holtec International. In this position, I am responsible for the development of analytical methods to evaluate cask designs.
2. I am duly authorized to verify Applicant's Response to State's Thirteenth Set of Discovery Requests to Applicant; specifically, Request for Admission Nos. 1-4, 6 and 7 and Interrogatory Nos. 18 and 20, as they relate to the performance of HI-STORM 100 storage casks and fuel canisters in a seismic event.
3. I certify that the statements and opinions in such responses are true and correct to the best of my personal knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2001

  
\_\_\_\_\_  
Dr. Alan I. Soler