

RAS 3811

STATE OF UTAH
OFFICE OF THE ATTORNEY GENERAL



MARK L. SHURTLEFF
ATTORNEY GENERAL

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OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

RAY HINTZE
Chief Deputy - Civil

RYAN MECHAM
Chief of Staff

KIRK TORGENSEN
Chief Deputy - Criminal

November 7, 2001

Emile L. Julian, Assistant for
Rulemakings and Adjudications
Rulemakings and Adjudications Staff
Office of the Secretary
U.S. Nuclear Regulatory Commission
11555 Rockville Pike, One White Flint North
Mail Stop: O16G15
Washington, D.C. 20555

Re: In the Matter of Private Fuel Storage, LLC, Docket 72-22

Dear Mr. Julian;

Enclosed are the original and two copies of the signature page of the declaration of Dr. Walter J. Arabasz (November 5, 2001), the faxed copy of which was filed in conjunction with State of Utah's November 5, 2001 Objections and Response to Staff's First Set of Formal Discovery Requests to State of Utah.

Thank you.

Sincerely,

Jean Braxton,
Legal Assistant

Enclosure: as stated
cc: PFS Docket 72-22-ISFSI Service List, without enclosure

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SECY-02

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

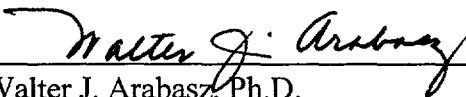
November 5, 2001

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 Objections and Responses to NRC Staff's October 25, 2001 First Set of Formal Discovery Requests to the State of Utah, dated November 5, 2001, are true and correct to the best of my knowledge, information and belief, as they relate to Request for Admission No. 4 and Interrogatories Nos. 1, 2, 4, and 5, for Contention Utah L, Part B. I have provided responses to these discovery requests in collaboration with my colleague, Dr. James C. Pechmann.

Dated this 5th day of November, 2001.

By:



Walter J. Arabasz, Ph.D.

Research Professor of Geology and Geophysics,
University of Utah;
Director, University of Utah Seismograph Stations