

April 2, 2002

Michael C. Farrar, Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Peter S. Lam  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Jerry Kline  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

Dear Administrative Judges:

Early this morning, the Staff served by mail (or express mail, for Ms. Chancellor and Mr. Silberg) copies of its proposed testimony, prefaces to testimony, exhibits, and key determinations concerning Unified Contention Utah L/QQ (Geotechnical), on all parties and the Licensing Board. In addition, the Staff transmitted electronic copies of each of those filings, other than the Staff's proposed exhibits, to all parties and the Licensing Board.

The Staff is now transmitting electronic copies of eight of its proposed exhibits to all parties and the Licensing Board. These consist of the documents identified below as Staff Exhibits P and R - X. One of the Staff's exhibits (Exhibit Q, the 1999 Stamatakis report) is not yet available in electronic format, but will be transmitted electronically as soon as possible.

In order to assure a complete record with respect to this matter, the following is a list of the documents that the Staff has served on the Licensing Board and parties, in connection with the upcoming hearings on Unified Contention Utah L/QQ:

1. "NRC Staff's Outline of Proposed Key Determinations For Unified Contention Utah L/QQ (Geotechnical)".
2. "Preface to NRC Staff Testimony of Goodluck I. Ofoegbu Concerning Unified Contention Utah L/QQ, Part C (Characterization of Subsurface Soils)".

3. "Preface to NRC Staff Testimony of Daniel J. Pomerening and Goodluck I. Ofoegbu Concerning Unified Contention Utah L/QQ, Part D (Seismic Design and Foundation Stability)".
4. "Preface to NRC Staff Testimony of Vincent K. Luk and Jack Guttman Concerning Unified Contention Utah L/QQ, Part D (Seismic Design and Foundation Stability)".
5. "Preface to NRC Staff Testimony of John A. Stamatakis, Rui Chen and Martin W. McCann, Jr., Concerning Unified Contention Utah L/QQ, Part E (Seismic Exemption)".
6. "Preface to NRC Staff Testimony of Michael D. Waters Concerning Radiological Dose Considerations Related to Unified Contention Utah L/QQ, Part E (Seismic Exemption)".
7. "NRC Staff Testimony of Goodluck I. Ofoegbu Concerning Unified Contention Utah L/QQ, Part C".
8. "NRC Staff Testimony of Daniel J. Pomerening and Goodluck I. Ofoegbu Concerning Unified Contention Utah L/QQ, Part D (Seismic Design and Foundation Stability)".
9. "NRC Staff Testimony of Vincent K. Luk and Jack Guttman Concerning Unified Contention Utah L/QQ (Geotechnical Issues)".
10. "NRC Staff Testimony of John A. Stamatakis, Rui Chen and Martin W. McCann, Jr., Concerning Unified Contention Utah L/QQ, Part E (Seismic Exemption)".
11. "NRC Staff Testimony of Michael D. Waters Concerning Radiological Dose Considerations Related to Unified Contention Utah L/QQ, Part E (Seismic Exemption)".
12. Staff Exhibit P, "Seismic Analysis Report on HI-STORM 100 Casks at Private Fuel Storage Facility, Rev. 1," dated March 31, 2002 (Vincent K. Luk, et al.).
13. Staff Exhibit Q, "Seismic Ground Motion and Faulting Hazard at Private Fuel Storage Facility in the Skull Valley Indian Reservation, Tooele County, Utah -- Final Report," dated September 1999 (John A. Stamatakis, et al.).
14. Staff Exhibit R, "Comparison of Western U.S. Hazard Curves" (undated).

15. Staff Exhibit S, which consists of three documents:
  - a. SECY-98-071, "Exemption to 10 CFR 72.102(f)(1) Seismic Design Requirement for Three Mile Island Unit 2 Independent Spent Fuel Storage Installation," dated April 8, 1998 (with attached draft letter and safety evaluation);
  - b. Staff Requirements Memorandum, dated May 20, 1998; and
  - c. Letter from Charles J. Haughney (NRC) to J. M. Wilcynski (DOE Idaho Operations Office), dated May 28, 1998, concerning the TMI-2 ISFSI seismic exemption request.
16. Staff Exhibit T, which consists of two documents:
  - a. Staff Requirements Memorandum, dated June 24, 1998; and
  - b. SECY-98-126, "Rulemaking Plan: Geological and Seismological Characteristics for Siting and Design of Dry Cask Independent Spent Fuel Storage Installations, 10 CFR Part 72," dated June 4, 1998 (with attached "Rulemaking Plan").
17. Staff Exhibit U, which consists of three documents:
  - a. Letter from Richard A. Meserve (Chairman, NRC) to Diane R. Nielsen, Ph.D. (State of Utah) and Jay Silberg, Esq. (PFS Counsel), dated November 27, 2001 (with two enclosures, listed as items 17.b. and c. below);
  - b. SECY-01-0178, "Modified Rulemaking Plan: 10 CFR Part 72 -- "Geological and Seismological Characteristics for Siting and Design of Dry Cask Independent Spent Fuel Storage Installations," dated September 26, 2001 (with attached "Modified Rulemaking Plan"); and
  - c. Staff Requirements Memorandum, dated November 19, 2001.
18. Staff Exhibit V, Holtec International Drawing No. 1495, Sheet 1 of 6 (Rev. 0), entitled "HI-STORM Assembly".
19. Staff Exhibit W, HI-STORM 100 Final Safety Analysis Report, Figure 5.3.11, Rev. 0, entitled "HI-STORM 100 Overpack Cross Sectional Elevation View".

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20. Staff Exhibit X, PFS Safety Analysis Report, Figure 1.2-1, entitled "PFSF General Arrangement".

Please do not hesitate to contact me if you experience any difficulty opening the electronic versions of these documents.

Sincerely,

**/RA/**  
Sherwin E. Turk  
Counsel for NRC Staff

cc: Service List