

18732

STATE OF UTAH
OFFICE OF THE ATTORNEY GENERAL



DOCKETED
USMRC

'98 JAN 12 P5:26

JAN GRAHAM
ATTORNEY GENERAL

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS

CAROL CLAWSON
Solicitor General

REED RICHARDS
Chief Deputy Attorney General

PALMER DEPAOLIS
Chief of Staff

January 9, 1998

72-22-15F51

Emile L. Julian, Assistant for
Rulemakings and Adjudications
Rulemakings and Adjudication 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

Dear Mr. Julian:

This office sent to you a pleading entitled "State of Utah's Request for Consideration of Late-Filed Contention GG" dated January 8, 1998. Attached to that pleading under Exhibit 29 was a faxed copy of the Declaration of Lawrence A. White, P.E. Under Exhibit 30 we sent you a faxed copy of the Declaration of Lawrence L. Holish, P. E.

We are enclosing the original of these two documents which will take the place of the faxed copies which were attached to this pleading. Please remove the faxed copies from your file and replace them with the enclosed originals.

Sincerely,

Jean V. Braxton
Legal Assistant

/kp

Template=SECY-018

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))

) Docket No. 72-22-ISFSI

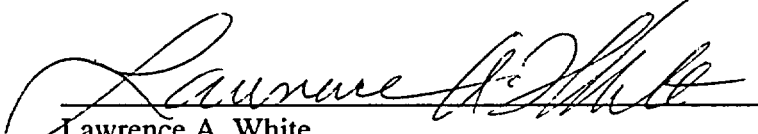
) ASLBP No. 97-732-02-ISFSI

DECLARATION OF LAWRENCE A. WHITE, P.E.

1. I am an Executive Vice President of Versar, Inc., an engineering and consulting firm headquartered in Springfield, Virginia. I have extensive experience in the areas of nuclear licensing and radioactive waste management, including the siting, design, construction, operation, and decommissioning of nuclear facilities. Copies of my resume, which further describes my qualifications, and a description of Versar, Inc., are attached as Exhibit 1 to the contentions filed by the State of Utah in this proceeding on November 23, 1997.

2. I am familiar with Private Fuel Storage's ("PFS's") Safety Analysis Report and the design of the casks that PFS proposes to use at its Private Fuel Storage Facility ("PFSF"). I am also familiar with the seismic analysis prepared by Sierra Nuclear, which is relied on by PFS in support of its license application.

3. I assisted in the preparation of, and have reviewed, the State of Utah's contention regarding Sierra Nuclear Corporation's Proprietary Reports on Seismic Stability and Transtor Storage Casks at the PFS Skull Valley site. The technical facts presented in that contention are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.


Lawrence A. White

Dated this 8 day of January, 1998.

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

ASLBP No. 97-732-02-ISFSI

3. I assisted in the preparation of, and have reviewed, the State of Utah's contention regarding Sierra Nuclear Corporation's Proprietary Reports on Seismic Stability and Transtor Storage Casks at the PFS Skull Valley site. The technical facts presented in that contention are true and correct to the best of my knowledge, and the conclusions drawn from those facts are based on my best professional judgment.

Dated this 7th day of Jan., 1998.