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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF THE SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Before the Atomic Safety and Licensing Board

In the Matter of:

) Docket No. 72-22-ISFSI  
) ASLBP No. 97-732-02-ISFSI

PRIVATE FUEL STORAGE, LLC

) Deposition of:

(Independent Spent Fuel  
Storage Installation)

) DR. STEVEN F. BARTLETT and

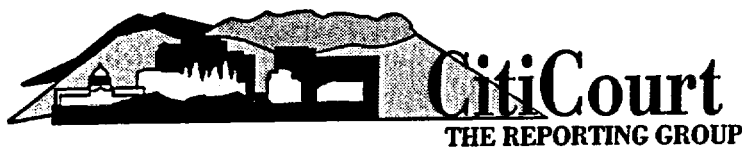
) DR. FARHANG OSTADAN

) Vol. I

Thursday, November 16, 2000 - 10:11 a.m.

Location: Offices of  
Parsons, Behle & Latimer  
201 S. Main, #1800  
Salt Lake City, Utah

Reporter: Vicky McDaniel, RMR  
Notary Public in and for the State of Utah



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State's  
Exhibit 99

NUCLEAR REGULATORY COMMISSION

Docket No. 72-32 Official Ex. No. 99  
 In the matter of PPS  
 Staff \_\_\_\_\_ IDENTIFIED ✓  
 Applicant \_\_\_\_\_ RECEIVED ✓  
 Intervenor ✓ REJECTED \_\_\_\_\_  
 Cont'g Off'r \_\_\_\_\_ DATE 6/20/02  
 Contractor \_\_\_\_\_ Witness B. Foster  
 Other \_\_\_\_\_  
 Reporter G. P. ...

1 MR. TRAVIESO-DIAZ: Just go off the record  
2 for a second while we look for those.

3 Let's go back on the record.

4 I'm going to mark as Exhibit 59 a document  
5 that I cannot identify because I didn't prepare it, but  
6 I'm going to ask the witness to identify. I would say  
7 for the record that it consists of one, two, three,  
8 four, five, six, seven -- eight pages of plots, hand  
9 plots, and also further state for the record that this  
10 document was provided to me by Counsel for the state  
11 yesterday.

12 (Exhibit 59 marked.)

13 And for the record, the reason they're not  
14 colored is I couldn't get copies in color in the time we  
15 had, so we're going through black and white copies.

16 Q. (By Mr. Travieso-Diaz) Now, could you  
17 explain to us, identify what this Exhibit 59 is?

18 A. (Dr. Bartlett) These are the CPT data, and  
19 plotted is the tip resistance. These are actually data  
20 from the SAR that have been enlarged on a photocopier,  
21 and then I traced over them with a pen. It's just a way  
22 to try to see what is the variation from CPT to CPT  
23 across -- I think all CPT's are represented here. At  
24 least it goes to CPT-39. I did this roughly in groups  
25 of five, because if you get too many lines it gets

1 reproduction of those plots.

2 Q. Well, you said by hand reproduction. How  
3 did you do it?

4 A. (Dr. Bartlett) I simply took the plot,  
5 enlarged it on the photocopier, then laid an overhead  
6 transparency on top of it and traced down the tip  
7 stress.

8 Q. All right. Now, let's take a look at the  
9 first document in this package, which --

10 MS. CHANCELLOR: Could I just go on the  
11 record? What Dr. Bartlett actually prepared were  
12 transparencies, and what I gave you was a color photo of  
13 the transparency because I couldn't reproduce this  
14 transparency.

15 MR. TRAVIESO-DIAZ: Well, let me ask the  
16 witness so that we know what's the best source.

17 Q. (By Mr. Travieso-Diaz) Would the best  
18 source for the original copy of the record be the  
19 transparency as opposed to the color copy?

20 A. (Dr. Bartlett) The best source of the  
21 original?

22 Q. Yeah, the best --

23 A. (Dr. Bartlett) I would say the color  
24 photocopies. I think they're adequate. I don't think  
25 they've been distorted markedly.

1 difficult to even understand what they mean.

2 Maybe it would be easier to do this plot by  
3 plot, if you so choose.

4 Q. Before we go plot by plot, let me see if we  
5 can get some description in the record of how this  
6 particular document was prepared. First, what was your  
7 original source for the preparation of these plots?

8 A. (Dr. Bartlett) Your diagrams in the SAR,  
9 CPT diagrams in the SAR.

10 Q. The diagrams, do you mean the foundation  
11 plots that we looked at before?

12 A. (Dr. Bartlett) No, these came from  
13 actually -- no, these did not come from the SAR. These  
14 came from the ConeTec report. Excuse me. These were  
15 the plots from the ConeTec and then enlarged on the  
16 photocopier.

17 Q. And when you say "from ConeTec," again, for  
18 the record, what is that you're talking about?

19 A. (Dr. Bartlett) The ConeTec report to  
20 provide the cone penetrometer data.

21 Q. So this is taken from the report done by the  
22 contractor that performed the cone penetration tests?

23 A. (Dr. Bartlett) That's correct.

24 Q. And this is a reproduction of those plots?

25 A. (Dr. Bartlett) This is -- yeah, hand

1 Q. Fine. Now, let us look at the first of  
2 these sets of plots.

3 A. (Dr. Bartlett) Sure.

4 Q. For some reason, the way I have them, the  
5 first one is for CPT-6 through 10.

6 A. (Dr. Bartlett) No. Actually, the first one  
7 should be CPT-1 through 5.

8 Q. But the way that this document is numbered,  
9 the first one that appears is 6 through 10. On my copy,  
10 anyhow.

11 A. (Dr. Bartlett) Yeah, they're just out of  
12 order.

13 Q. All right. So you are directing my  
14 attention, then, to the last page of the exhibit?

15 A. (Dr. Bartlett) I always, just for some  
16 reason, want to start at one.

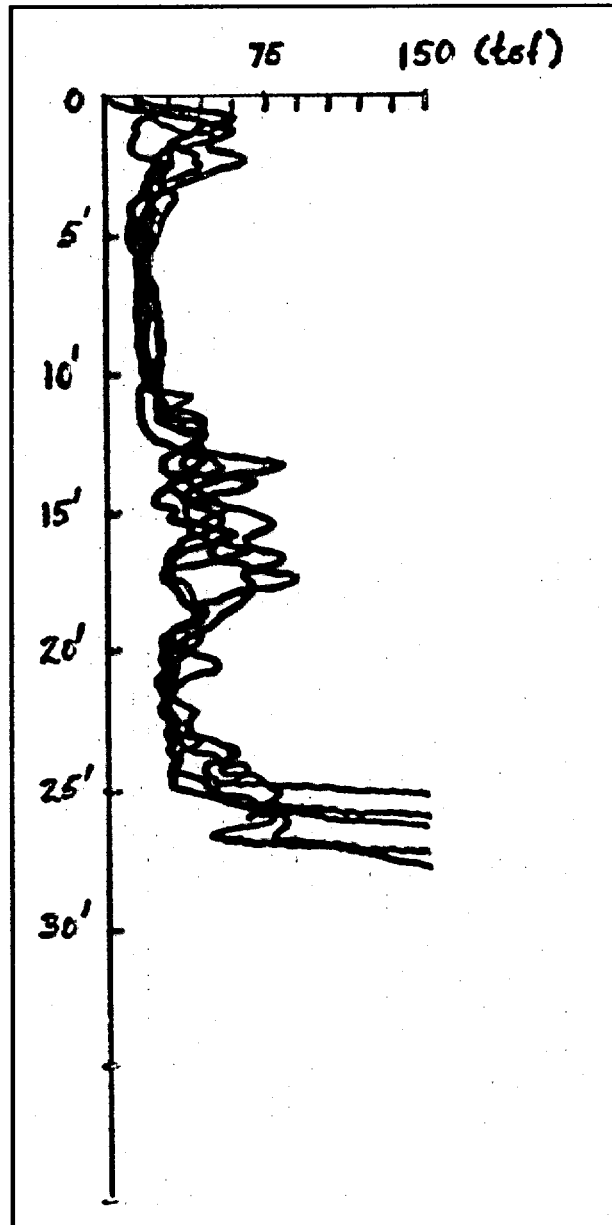
17 Q. No problem. Just so the record is clear as  
18 to what we're talking about.

19 A. (Dr. Bartlett) Let's go through the plot  
20 leg with CPT-1 through 5, and it's in brown in the color  
21 versions.

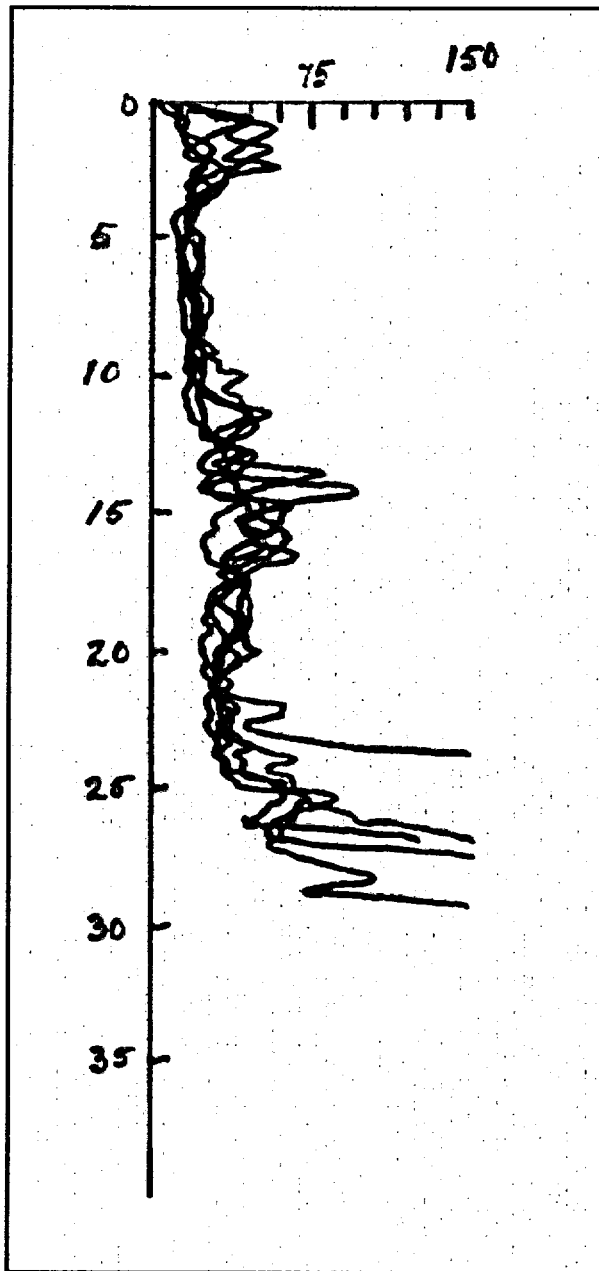
22 Q. Are all the plots in brown?

23 A. (Dr. Bartlett) All of the CPT-1 through 5  
24 are all plotted in brown, yes.

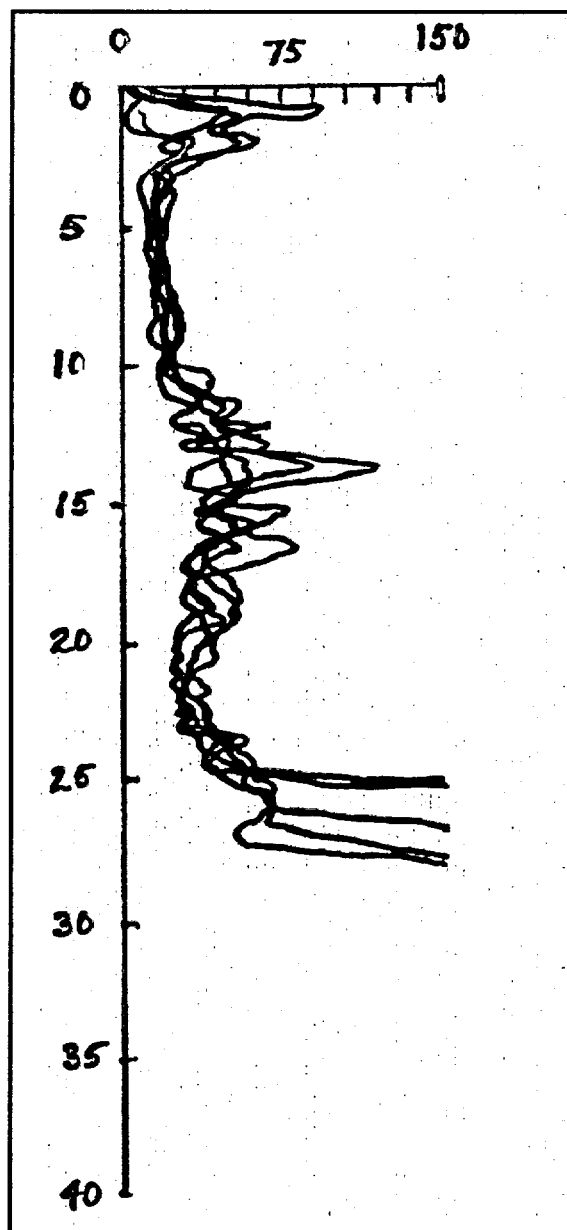
25 Q. So you don't lose any quality just by having



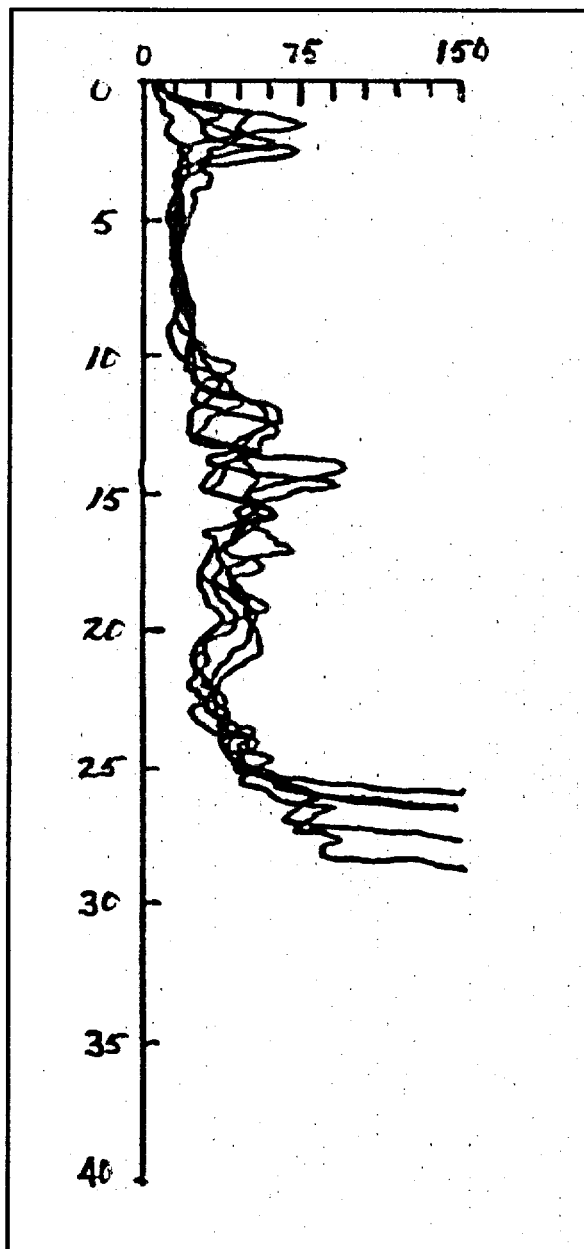
**Figure 1.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 1 through 5.



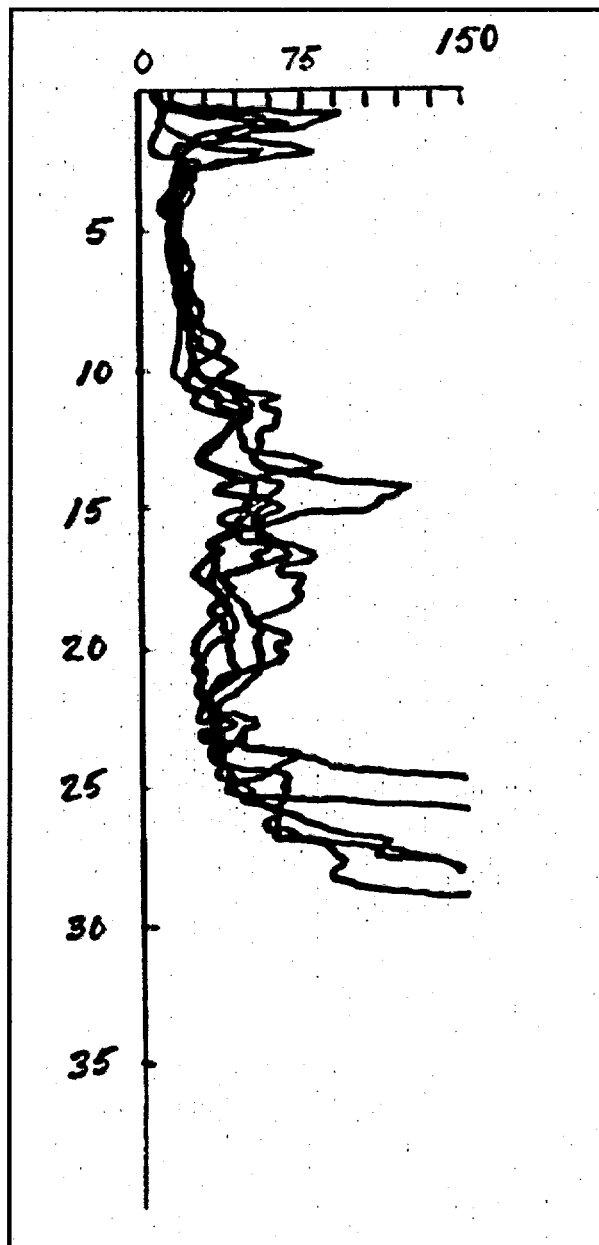
**Figure 2.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 6 through 10.



**Figure 3. Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 11 through 15.**

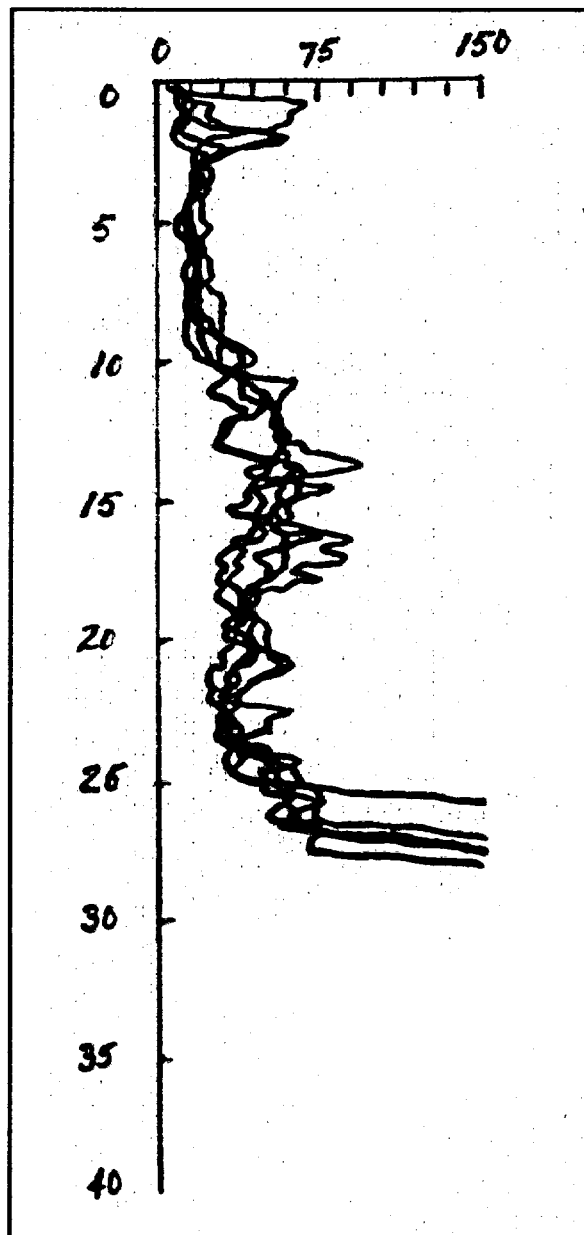


**Figure 4.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 16 through 20.

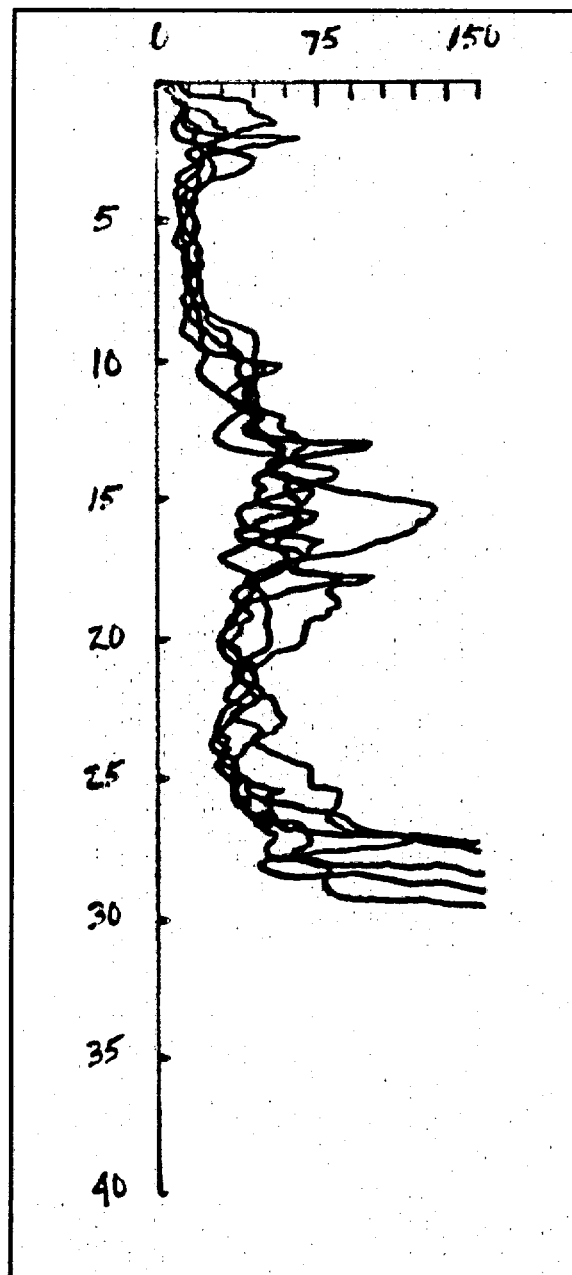


**Figure 5.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 21 through 25.

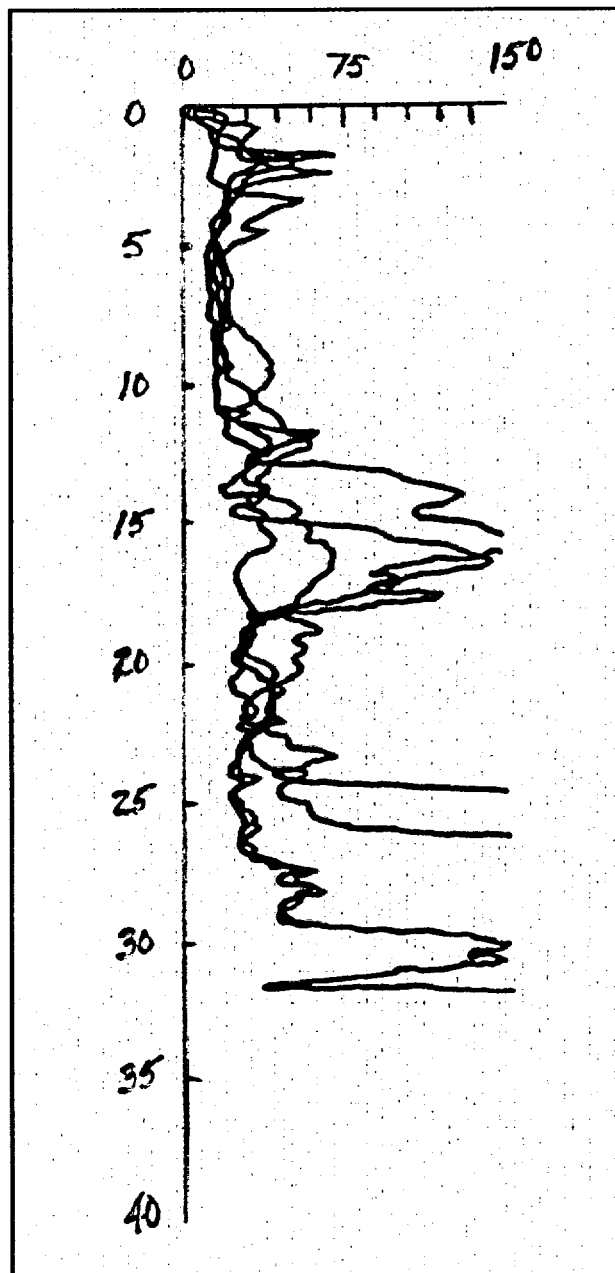




**Figure 6.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 26 through 30.



**Figure 7.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 31 through 35.



**Figure 8.** Composite Plot of Cone Penetrometer Test (CPT) traces of tip stress (tons per square foot - x axis) versus depth (feet - y axis) for CPT soundings 36 through 39.