

P.O. Box C4010, La Crosse, WI 54602-4010 Phone 303-741-7009 Fax: 303-741-7806 John L. Donnell, P.E., Project Director

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001 June 2, 2000

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COMMITMENT RESOLUTION LETTER #34 DOCKET NO. 72-22 / TAC NO. L22462 PRIVATE FUEL STORAGE FACILITY <u>PRIVATE FUEL STORAGE L.L.C.</u>

A meeting was held on May 25, 2000 in San Antonio, Texas between Private Fuel Storage (PFS), Stone and Webster (S&W), and the NRC/CNWRA to discuss several open issues remaining with the Private Fuel Storage Facility (PFSF) Safety Analysis Report (SAR). The topics discussed and the PFS actions necessary to resolve these issues are outlined below.

GEOTECHNICAL

Several issues were discussed relating to bearing capacity and sliding stability analyses of the cask storage pads and the Canister Transfer Building.

1. The NRC indicated that PFS has not demonstrated that the total stress strength parameters were determined for ranges of stresses applicable to the final stresses that are expected under the pads and the Canister Transfer Building due to the design basis ground motion. The NRC indicated that there were three approaches that they would consider acceptable to resolve this concern. PFS could remove the bearing capacity analyses that were based on the total-stress parameters. Alternatively, PFS could test additional samples at stresses that are high enough to demonstrate that the total-stress strength parameters being used in the analyses do not overshoot the undrained strength that is applicable for these partially saturated soils when they are loaded to stresses high enough to result in complete saturation. Finally, PFS could perform additional tests on saturated specimens of these soils to determine their effective-stress strength and use that strength in the analyses.

PFS Response

PFS agreed to remove the portions of the static bearing capacity analyses that were based on the total-stress strengths.

2. The analyses of the sliding stability of the cask storage pads indicate that sufficient sliding resistance will be provided by the soil cement that will be constructed above the base of the pads if the soil cement has an unconfined compressive strength that exceeds 250 psi. The NRC requested that this compressive strength of 250 psi and QA testing during construction to verify the strength of the soil cement must be made part of the licensing commitments for the facility.

PFS Response

PFS concurred with the requirement that the soil cement beneath and surrounding the cask storage pads will be designed and constructed to have a minimum unconfined compressive strength of 250 psi and that QA testing will be performed during construction to demonstrate that this minimum strength is achieved. This commitment will be clarified in SAR Chapter 2, Section 2.6.4.11, which currently discusses "Soil-Cement Mix and Procedure Development".

3. The NRC suggested that PFS revise the dynamic bearing capacity analyses of the Canister Transfer Building to use only the undrained strength of the clayey soils, rather than using the total-stress strength. They indicated that it is reasonable to use an average value of the strength for the soils within a depth equal to the width of the foundation. They suggested that PFS justify using an increase in the value of the undrained strength that was measured in the laboratory tests on specimens from the weakest zones within the profile based on the relative increase in the undrained strength of the underlying soils that was observed in the cone penetration test results.

PFS Response

PFS agreed to remove the portions of the dynamic bearing capacity analyses that were based on the total-stress strengths. PFS will reanalyze the dynamic bearing capacity using an average undrained strength that is applicable for a depth equal to the width of the foundation, basing this strength on the relative difference between the strength measured in the laboratory tests performed on samples obtained from the weakest portion of the profile and the undrained strengths measured in the CPT tests.

4. The NRC indicated that PFS must construct an engineered mechanism (i.e., a shear key) in order to rely on the cohesive strength of the in situ clayey soils to resist sliding of the Canister Transfer Building. In addition, PFS cannot rely on published results of dynamic tests performed on similar clays to justify using an increase in static strength of the clay to resist sliding due to the dynamic loads due to the design basis ground motion. In order to justify such an increase, PFSF must perform dynamic laboratory tests on soils obtained from the site near the base of the building. Alternatively, they suggested that PFS include the passive resistance acting on the edge of the mat to demonstrate that there is sufficient resistance to sliding without relying on the 50% increase in static strength of the clay to resist the dynamic horizontal load due to the design basis ground motion.

PFS Response:

PFS will add a one-foot deep key to the perimeter of the Canister Transfer Building mat to address concerns the NRC expressed about using the cohesive strength of the clayey soils to resist sliding. This key will force any potential sliding failure to pass within the clayey soils, guaranteeing that the resistance to sliding will be provided by the cohesive portion of the strength of the soils enclosed within the box defined by the perimeter key. PFS will revise the sliding stability analyses to use the shear strength measured in the direct shear tests for the stress levels existing under the Canister Transfer Building. PFS will also add the passive resistance acting on the Canister Transfer Building mat to the sliding stability analysis. Preliminary analyses indicate that these changes will result in acceptable factors of safety for all loading cases without relying on the increase in the static strength that is applicable for rates of strain associated with dynamic loadings due to the design basis ground motion.

The calculation package addressing bearing capacity and sliding stability analyses of the cask storage pads and the Canister Transfer Building will be revised as discussed above and submitted to the NRC by June 16, 2000. The PFSF license application will be updated as required and submitted to the NRC by June 23, 2000.

CANISTER TRANSFER BUILDING CRANES AND SEISMIC SUPPORT STRUTS

NRC Questions/Comments

1. The seismic ground accelerations in the new probabilistic design basis are lower, however the dynamic soil properties resulted in increased accelerations at the crane rail elevations in the building. PFS needs to provide additional information on the

evaluations that were performed to demonstrate that stresses are within allowable limits and design safety factors are appropriate.

PFS Response

The PFSF overhead and semi-gantry cranes have been seismically analyzed in accordance with ASME NOG-1 to ensure they will remain in place and support the load during and after a seismic event. The analyses were performed for both cranes by the crane vendor, Ederer Incorporated, to qualify the crane designs for the PFSF deterministic design earthquake (0.67g horizontal, 0.69g vertical). The cranes were subsequently reviewed by Ederer for their seismic stability based on the current PFSF probabilistic design basis ground motion of 0.53g horizontal and 0.53g vertical and resulting response spectra curves. The Ederer evaluation is summarized in SAR Chapter 4, Section 4.7.2.5.3. A copy of the Ederer evaluation (SAR Reference 63) is included as Attachment 1 and should provide the additional information requested.

2. The load cases and supporting discussion presented in the SAR for the design of the Canister Transfer Building are adequate for the overall building evaluation. PFS has stated that during the detailed design phase, all load cases as described in SAR Chapter 3 and all areas will be addressed in detail. The NRC needs additional information (drawings referenced in calculation SC-10) on the design of the seismic support struts used in the canister transfer cells.

PFS Response

The drawings included in the reference section of S&W calculation 0599602-SC-10, Revision 0, "Seismic Restraints for Spent Fuel Handling Casks" are included as Attachment 2. Please note that drawing 0599601-EM-4-B is not included. This is a general arrangement drawing of the Intermodal Transfer Point and should not have been referenced in calculation 0599602-SC-10.

CASK TRANSPORTER/ONSITE EXPLOSIONS/ONSITE FIRE HAZARDS

NRC Questions/Comments

1. PFS should assess the affect of a seismic event and the impact from a tornado driven missile on a storage cask that is being transported to the storage pad using the cask transporter.

PFS Response

PFS will assess the affect of a seismic event as well as the affect of the impact from a tornado driven missile on a storage cask that is being transported to the storage pad using the cask transporter.

The results of this assessment will be provided to the NRC by June 16, 2000. The PFSF license application will be updated as required and submitted to the NRC by June 23, 2000.

2. The current evaluation for onsite explosions in SAR Chapter 8 considers the rupture of the entire contents of the propane storage tank (20,000 gallons), mixing with air before ignition, and a subsequent explosion equivalent to a detonation of TNT. The explosion is assumed to occur at a distance of 1,384-ft from the Canister Transfer Building and the nearest storage cask and it demonstrates that the resulting overpressure will not exceed 1.0 psi. PFS should evaluate possible movement of the propane vapor cloud combined with delayed ignition and determine the resulting overpressure on the Canister Transfer Building and the nearest storage cask. The potential for buildup of propane vapor and possible ignition in the Canister Transfer Building should also be evaluated.

PFS Response

PFS will assess the scenarios of delayed ignition with vapor cloud dispersion for both an instantaneous tank failure (release of 20,000 gal) and a break of the largest pipe attachment to the tank. The wind speeds and atmospheric stability conditions used will be the worst realistic case based on the meteorological data for the site. Software programs U.S. EPA SCREEN3 and TSCREEN will be used for these calculations. The results will be used to evaluate the impact on the Canister Transfer Building (including possible propane concentration at or around the building) and the storage casks.

The evaluation as discussed above will be submitted to the NRC by June 16, 2000. The PFSF license application will be updated as required and submitted to the NRC by June 23, 2000.

3. Do the fire scenarios evaluated and presented in SAR Chapter 8 for the Canister Transfer Building consider the effects of flame height on SSCs important to safety?

PFS Response

Yes. The calculations made for the fire scenarios presented in the SAR calculated a flame height of 3.74 m from the tire fire. Based on the work of Blinov and

Khudiakov, as reported in Figure 3-11.2 of the SFPE Handbook of Fire Protection Engineering, Second Edition (p3-199), the flame height for the diesel fuel spill would be 5.1 m. The low bay ceiling is 9.1 m. With this ceiling height, the estimated flame heights and the worst-case plume temperatures calculated, it is unlikely that there would be any flame impingement on the ceiling, even directly above the pool fire. The crane is more than 16.7 m above the floor and at least 5 m horizontally from the worst case fire scenario. Therefore, no flame or plume impingement should effect the structural integrity of the crane or its supports.

The PFSF license application will be updated as required and submitted to the NRC by June 23, 2000.

AIRCRAFT AND ORDINANCE CRASH HAZARD ASSESSMENT

PFS provided a summary update of new information obtained from the U.S. Air Force with regard to the following issues:

- Hazards posed by aircraft flights into and out of Michael Army Air Field
- Hazards posed by aircraft flying to and from Hill Air Force Base and over the UTTR
- Hazards posed by the firing of air delivered munitions on the UTTR
- Cumulative impact of aircraft accident potential

The "Aircraft Crash Impact Hazard at the Private Fuel Storage Facility" dated February 2, 2000 will be revised to include this new information and submitted to the NRC by June 2, 2000.

If you have any questions regarding this response, please contact me at 303-741-7009.

Sincerely

Cooper fan

John L. Donnell Project Director Private Fuel Storage L.L.C.

Enclosure

U.S. NRC

June 2, 2000

Copy to:

Mark Delligatti-1/1 John Parkyn-1/0 Jay Silberg-1/1 Sherwin Turk-1/0 Asadul Chowdhury-1/1 Murray Wade-1/0 Scott Northard-1/0 Denise Chancellor-1/1 Richard E. Condit-1/0 John Paul Kennedy-1/0 Joro Walker-1/0

ATTACHMENT 1

EDERER Evaluation

(25 pages)

EDERER INCORPORATED ISO 9001 Certified		FAX			
Sent:	September 1, 1999 (12:36PM)	Pages {including this page}: (26 pages)			
From:	SCOTT ANDERSON	Project: F-2621/22			
То:	JERRY COOPER / STAN MAC	E, STONE & WEBSTER 3037417806			
Subject:	SKULL VALLEY: HIGHER SE	ISMIC ACCELERATIONS			

Dear Mr. Cooper,

Here is our engineering dept. preliminary review of the estimated effects which the new seismic response spectra will have on the 2 cranes for the Skull Valley Project. I hope that this work is timely and to your satisfaction, and please let me know immediately if you require anything additional.

For tracking purpose we have about 8 hours of engineering time into this investigation. In the future at a convenient time both Ederer and SWEC will have to discuss any possible cost price increases which there may or may not be.

Sincerely,

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Scott Anderson Project Manager

CC: Randy James, Anatec H. 619 455 1094

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ISO 9001 Certified



The Phase I, Initial Detailed Engineering for Ederer Job Nos. F2621 (200T Bridge Crane) and F2622 (150T Semi Gantry Crane) was carried out using the response spectra curves per the original specification attachment 9, and are included in Appendix A. Revised curves are dated 8/30/99 and are also included in Appendix A, Table 1 gives a comparison between the original and revised curves on the basis of peak acceleration, frequency and percent increase (or decrease) in peak acceleration. Tables 2 and 3 list the maximum percentages of allowable stress for the various components analyzed in the seismic analysis that was originally done on these cranes. Since the peak accelerations occur at relatively low frequencies (\equiv 3-4hz horizontal, and \cong 6-7 hz vertical) and, these frequencies are close to typical crane structural natural frequencies, a dynamic analysis would have to be done to really define how the structural loading might vary. This would be especially true if a particular mode were close to either the increasing or _ decreasing side of the response curve. Comparison of the static peak accelerations will however, give an indication of the results of a dynamic analysis.

For the 200T bridge crane, the vertical peak change is + 14%. The N-S lateral forces are governed by wheel slip and will remain constant. Since the bridge girders, trolley trucks, trolley girder and equalizing sill are at approximately 90% or more of the allowable stress and this margin should be maintained, the section moduli would have to increase approximately 14%. The bridge trucks will be also affected by the large E-W horizontal peak change (+100%). They are however at a lower % allowable stress of \equiv 72%. The section modulus for the trucks would then have to increase approximately 10%. See Appendix A for a sample calculation.Our conclusion is that the bridge crane will still fit in the same envelope as shown on PA-2189, Rev. B but will be somewhat heavier.

For the 150T gantry crane the vertical peak change is +14% on the west end and +8% on the east end. The N-S lateral forces are governed by wheel slip and will remain constant. The E-W lateral peak change is +100% on the west end and -17% on the east end. The equalizing sill, end tie, and gantry trusses are at low enough % allowable stress that they should remain unchanged. The bridge girder, trolley tuck and trolley girder section moduli would increase by approximately 12%. The gantry leg section modulus would increase approximately 50% at the top end and remain the same at the bottom. The joints at the girder/leg interface and the girder/truck interface would have to increase in strength to handle the increased E-W lateral loading. The bridge trucks will be affected by the vertical peak change and the large E-W horizontal peak change at elevation 170 ft. They are however at a % allowable stress of $\approx 75\%$, similar to the bridge crane. The section modulus for the trucks would then have to increase approximately 10%. See Appendix A for a similar sample calculation. In conclusion, we expect that the semi gantry crane will still fit in the same envelope as shown on PA-2190, Rev. C but will be somewhat heavier.

This analysis deals with technical issues, commercial issues will be dealt with in separate correspondence.

Fred Langford, C.E. Mechanical

2925 FIRST AVENUE SOUTH, SEATTLE, WA 98134 • P.O. BOX 24708, SEATTLE, WA 98124 TEL: (206) 622-4421 • EMAIL: ederer@ederer.com • FAX; (206) 623-8583

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4-13	End tit	14 span	ISOT/HE	55,9
4-13	Gentry Its	145pan	150T/HL	76.3
4-12	Gantry	1/4 3 pun	Nu load	54.9



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ATTACHMENT 9

DESIGN RESPONSE SPECTRA

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Canister Transfer Building Design Response Spectra, El. 100 ft, N-S Direction	A9-3
Canister Transfer Building Design Response Spectra, El. 100 ft, Vertical Direction	A9-4
Canister Transfer Building Design Response Spectra, EL 170 ft, E-W Direction	A9-5
Canister Transfer Building Design Response Spectra, El. 170 ft, N-S Direction	A9-6
Canister Transfer Building Design Response Spectra, El. 170 ft, Vertical Direction	A9-7

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ATTACHMENT 2

DRAWINGS REFERENCED IN CALCULATION 0599602-SC-10, REVISION 0

0599601-EA-8-D 0599601-EA-9-D 0599601-EA-12-C 0599601-EM-1-D 0599601-EM-2-D 0599601-EM-3-D 0599602-EC-2-A 0599602-EC-3-A 0599602-EC-4-A 0599602-EC-5-A 0599602-EC-6-A 0599602-EC-7-A

Vendor Catalog Information on Struts and Brackets (11 pages)

THIS PAGE IS AN OVERSIZED DRAWING OR FIGURE, THAT CAN BE VIEWED AT THE RECORD TITLED: 0599601-EA-8-D, REV D: CANISTER TRANSFER BUILDING FLOOR PLAN

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VENDOR CATALOG INFORMATION ON STRUTS AND BRACKETS

6-01-200 9:22AM

FROM STONE WEBSTER

609 482 3171

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Ø 001/011 P. 1

06/01/00 08:42 5-31-200 2:46PM

13781 938 0026 T FROM STONE WEBSTER

TPG MEBSTER 609 482 3171

FAX

Dated 5-31-2000

To W. Dunleavy Bergen Power Pipe Support Phone No. 781-935-9550 Fax No. 781-935-7664

From A.Cokonis/B.Ebbeson SWEC Cherry Hill, NJ Phone No. 856-482-3136, 856-482-4654 Fax No. 856-482-3283, 856-482-3171

Bill, based on your prior conversation with Ozzie Bilgin (8-13-99), regarding the load capacity of struts to be used on Skull Valley Spent Fuel Casks, I am requesting that you fax the load capacity data that are specific to the size of the strut used in this application. The two Nuclear Service struts are:

 Strut No. 1.
 Part 2252-Size 130, Pin to pin = 114.5" = 9'-6.5". Both ends with bracket

 (no clamp).
 MAX LOAO
 240,077 * STRUT

 Z 38,000
 BEACKET
 MAX. FAULTRO

 Strut No. 2.
 Part 2100-Size 200, Pin to pin = 90.7" = 7'-6.75". Both ends with bracket

 (no clamp).
 MAX LUGAD
 351,000

 STACKET
 MAX. FAULTRO

 376,000
 BEACKET

Based on your conversation with Ozzie you mentioned that the Level D capacity for Strut No. 1 was 238 Kips and for Strut No. 2 was greater than 324 kips. These capacities must be met, otherwise please suggest alternate strut components.

Your prompt response will be appreciated.

Alex Cokonis/B. Ebbeson

REPUY:

STRUT LOADS HAVE BREN ADJUSTED TO SUIT PIN TO PIN DIMENSIONS,

LCDS FOR PART 2252, 1000 AND 2100, 2003 ALL ATTACHED

Wm. B. Dulay BERGEN-POWER PIER SUPPORTS



9 d

1715 282 909

FROM STONE WEBSTER

MAIE:0 002-10-3









P. 10

609 482 3171

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