



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 24, 2000

Mr. John D. Parkyn
Chairman of the Board
Private Fuel Storage, L.L.C.
P.O. Box C4010
La Crosse, WI 54602-4010

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE ENVIRONMENTAL
IMPACT STATEMENT (TAC NO. L22462)

Dear Mr. Parkyn:

By application dated June 20, 1997, as supplemented by letter dated August 28, 1998, Private Fuel Storage L.L.C. (PFS) requested a license to receive, transfer, and possess nuclear power reactor spent fuel and other radioactive material associated with spent nuclear fuel storage in an independent spent fuel storage facility (ISFSI) on the Reservation of the Skull Valley Band of Goshute Indians. As part of the licensing process for an away-from-reactor ISFSI, the Nuclear Regulatory Commission (NRC) is required, pursuant to 10 CFR 51.20(b)(9), to prepare an environmental impact statement (EIS) to satisfy its statutory responsibilities under the National Environmental Policy Act of 1969, as amended (NEPA). In addition, the Department of Interior's (DOI) Bureau of Indian Affairs (BIA) must decide whether it will approve the lease negotiated between the Skull Valley Band of Goshute Indians and PFS. DOI's Bureau of Land Management (BLM) must decide whether to amend the land management plan for the area where PFS is proposing to build a rail line connecting the main line to the proposed site of the PFS facility, as well as whether to issue rights-of-way for the proposed rail line and Intermodal Transfer Facility. The Surface Transportation Board (STB) must decide whether to approve the new rail line. As Federal agencies, BLM, BIA, and STB are also required to comply with NEPA. To gain efficiencies, the NRC, BLM, BIA, and STB are cooperating in the preparation of the EIS. A Draft EIS was published with a 90-day public comment period. During that comment period, many comments were received on the DEIS.

Enclosed is a request for additional information (RAI) which is needed by the NRC staff and the cooperating agencies to complete the final EIS. It is my understanding that Mr. Scott Flanders of the NRC staff has previously provided you with information on the schedule required for your response to this RAI. We will expect your reply within ten working days of your receipt of this letter.

J. Parkyn

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Please contact Scott Flanders at (301) 415-1172 if you wish to schedule a public meeting on the RAI or to discuss any questions you may have about this letter or the enclosed RAI.

Please reference TAC No. L22462 and Docket No. 72-22 in future correspondence related to this request.

Sincerely,

/RA/

Mark S. Delligatti, Senior Project Manager
Spent Fuel Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-22
TAC No. L22462

Enclosure: Request for Additional Information

cc w/ enclosure: EIS Service List

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J. Parkyn

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Sincerely,

(Original Signed by:)

Mark S. Delligatti, Senior Project Manager
Spent Fuel Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-22
TAC No. L22462

Enclosure: Request for Additional Information

cc w/ enclosure: EIS Service List

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OFFICE:	SFPO	C	SFPO	E	SFPO	C		
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DATE:	10/23/00		10/23/00		10/23/00			

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REQUEST FOR ADDITIONAL INFORMATION
FOR THE PRIVATE FUEL STORAGE FACILITY
ENVIRONMENTAL IMPACT STATEMENT
DOCKET NO. 72-22

The general requirements for a Nuclear Regulatory Commission (NRC) final environmental impact statement (FEIS) are delineated in 10 CFR 51.91. Pursuant to 10 CFR 51.91(a)(1), the documentation associated with the Final Environmental Impact Statement will include responses to comments on the draft environmental impact statement (DEIS). To respond to some comments, it may be necessary for the staff to supplement or modify analyses included in the DEIS. The NRC staff reviewed the public comments and determined that additional information is needed for the staff to determine if analyses in the DEIS need to be supplemented or modified. Also, as a result of changes in the proposed action, the NRC staff identified the need to revise some of the information and analyses in the DEIS. For these changes, additional information is being requested.

1. Provide updated information for Table 1.1 in the Draft Environmental Impact Statement (DEIS). Specifically, include storage capacities and projected dates for loss of full-core offload.
 - This information is requested as a result of changes in the PFS membership.
2. Provide the capacity (i.e., on-pad storage in MTU) of the proposed Private Fuel Storage Facility (PFSF) if only spent nuclear fuel from member utilities were to be accepted.
 - This information is requested as a result of changes in the Private Fuel Storage L.L.C. (PFS) membership.
3. Provide the status of the wetlands delineation along the proposed rail corridor and state whether a Section 404 permit will be required. Also, provide any updated information on the status of required permits and approvals.
 - This information is required to update DEIS Section 1.6.
4. Explain the PFS policy on using on-site fire fighting capability to assist with the fighting of wildfires not directly on the site but in Skull Valley (or elsewhere in Tooele County).
 - This information is needed to clarify whether such activities would ever negatively impact PFS's on-site fire fighting capabilities.
5. Revise and update the costs and benefits of the proposed PFSF. All previous cases should be revised to reflect:
 - a) The current date that the PFSF would become operational.
 - b) Any revisions required or implied by changes in PFS membership (e.g., Florida Power, GPU and Illinois Power). At a minimum, this should reflect the alteration in the members-only case and/or the small-throughput case.
 - The previous analyses were based on 2002 as the date the facility would begin to accept spent nuclear fuel. Current information indicates that this date should be revised to 2003.

6. Provide new cost-benefit calculations to address the break-even case, this scenario should include both a 2010 and 2015 opening date for the U.S. Department of Energy permanent repository.
 - This case should include the lowest throughput that would allow PFS to break-even with respect to benefits and costs calculated at a 7% discount rate.
 - The PFS facility costs should be adjusted to reflect the on-pad capacity that would accommodate this break-even throughput. That is, in addition to identifying this break-even throughput, PFS should also identify the capacity of such a facility.
7.
 - a) Discuss in more detail the basis for the assumed "30% discount" price of the storage casks to be used at the PFSF.
 - b) Explain what importance this assumed discount has on the results of the previous cost-benefit analysis.
 - c) If this price is significant, provide updated cost-benefit data that show the costs and benefits both with and without this discount.
 - Original discussion of this discount did not cover these points.
8. Confirm whether the \$200 million "accident" insurance cost has been included in the previous cost-benefit calculation.
 - This information was not previously provided.

cc's for PFS EIS:

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