

RAS 2567

# ShawPittman

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JAY E. SILBERG  
202.663.8063  
jay.silberg@shawpittman.com

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December 28, 2000

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS STAFF

G. Paul Bollwerk, III, Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

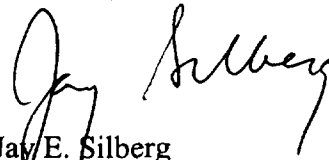
Dr. Peter S. Lam  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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

Gentlemen:

On December 14, 2000, I forwarded to you a letter dated December 11, 2000 from PFS to the NRC Staff concerning the geotechnical assessment of the site. The December 11 letter stated that PFS anticipated completing its assessment of the implications of the evaluation described in that letter by December 22, 2000. For your information, I am forwarding to you the attached letter dated December 22, 2000 from PFS to the NRC Staff. As contemplated by the December 14 letter, the attached letter presents the initial assessment of the implications of revisions to the geotechnical characterization of the PFSF site resulting from the inclusion of geotechnical data not previously incorporated. Copies of the attached letter have already been provided to the parties.

Very truly yours,



Jay E. Silberg  
Counsel for Private Fuel Storage L.L.C.

Enclosure

Template = SECY-043

2300 N Street, NW Washington, DC 20037-1128

202.663.8000 Fax: 202.663.8007

SECY-02

www.shawpittman.com

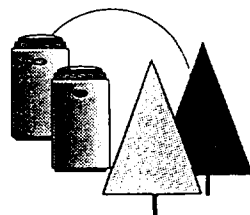
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# ShawPittman

G. Paul Bollwerk, III, Chairman  
Peter S. Lam, Administrative Judge  
Jerry R. Kline, Administrative Judge  
December 28, 2000  
Page 2

cc: (w/encl.)  
Sherwin Turk, Esq.  
Denise Chancellor, Esq.  
Susan F. Shankman, Esq.  
Office of the Secretary, USNRC  
Adjudicatory File, ASLBP  
Diane Curran, Esq.  
John Paul Kennedy, Esq.  
Joro Walker, Esq.  
Danny Quintana, Esq.

Document #: 1052991 v.2



*Private Fuel Storage, LLC*

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*P.O. Box C4010, La Crosse, WI 54602-4010*

*John D. Parkyn, Chairman of the Board*

December 22, 2000

Mr. Mark Delligatti  
Senior Project Manager  
Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**GEOTECHNICAL CHARACTERIZATION OF PFSF SITE**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

Reference: PFS Letter, Parkyn to Delligatti, Geotechnical Characterization of PFSF Site, dated December 11, 2000

PFS has completed the initial assessment of the implications of revisions to the geotechnical characterization of the PFSF site resulting from the inclusion of data not previously incorporated. We have determined that there will be an impact to the project licensing basis. An amendment to the License Application will be prepared to reflect the required changes in the PFSF design basis ground motion and dynamic stability analyses based on new shear and pressure wave velocity profiles being developed for the site. This amendment will update the following chapters/sections of the PFSF License Application:

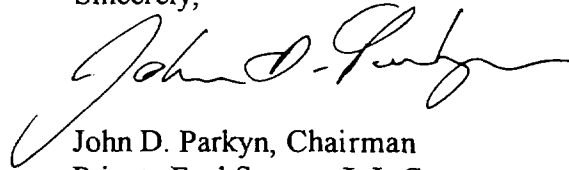
1. Section 2.6.2.1 of the SAR, "Engineering Properties of Materials for Seismic Wave Propagation and Soil-Structure Interaction", will be revised to incorporate any changes that are made to the velocity profiles and resulting changes to the site response analyses and idealized soil profiles for use in soil-structure interaction analyses. Section 2.6.1.12 of the SAR, "Stability of Foundations for Structures and Embankments" will be updated, as necessary, to revise discussions of the results of dynamic stability analyses of the storage pads and the Canister Transfer Building resulting from changes to the PFSF site design basis ground motion. SAR Section 2.6.4.9, "Design Basis Ground Motion", will be updated, as necessary, to identify the

new design basis ground motions. Changes to maintain consistency will also be made to other subsections of Section 2.6 of the SAR.

2. Section 3.2.10.1.1 of the SAR, "Design Response Spectra", will be revised to reflect the site-specific horizontal and vertical response spectra curves associated with the new design basis ground motion. Changes to maintain consistency will also be made to other subsections of Section 3.2.10 of the SAR.
3. Section 4.2.1.5.1(H) of the SAR, which evaluates the structural design of the storage cask under seismic conditions, will be updated to reflect the results of the HI-STORM storage cask stability analyses based on the new seismic response spectra. SAR Section 4.2.3.5.1, "Storage Pad Analysis", will be revised to reflect the dynamic analyses of the storage pads for the new design basis ground motion. SAR Sections 4.7.1, "Canister Transfer Building", and 4.7.2, "Canister Transfer Cranes", will be updated as necessary to incorporate changes resulting from the new seismic loads.
4. SAR Section 8.2.1, "Earthquake", will be revised to reflect the new design basis ground motion and the results of the HI-STORM storage cask stability analyses based on the new seismic response spectra. In addition, the discussion of the stability of a loaded cask transporter under seismic conditions (Section 8.2.6.2) will be updated for the new design basis ground motion.
5. Section 2.6 of the PFSF Environmental Report, which includes a summary of the geotechnical and seismic information in Chapter 2 of the SAR, will also be updated so that it is consistent with the information presented in the SAR. Section 2.6.5 of the ER, "Engineering Characteristics of Site Materials", will be revised to incorporate any changes that are made to the velocity profiles and resulting changes to the site response analyses and idealized soil profiles that were used in the soil-structure interaction analyses. ER Section 2.6.8, "Design Basis Ground Motions", will be updated, as necessary, to identify the new design basis ground motions. Changes to maintain consistency will also be made to other subsections of Section 2.6 of the ER. PFS does not anticipate that changes will be needed in the NRC's Environmental Impact Statement (EIS), since Section 4.1 of the Draft EIS, "Geology and Soils", states that "The adequacy of the proposed PFSF design to withstand earthquakes will be addressed in the NRC's final SER and is not addressed in this DEIS."

Several calculations, analyses, and reports must be revised to support the license amendment and will also be submitted to the NRC. The current target date for submittal of Amendment #20 to the License Application is March 2, 2001. If you have any questions regarding this response, please contact me at 608-787-1236 or Mr. John Donnell, Project Director, at 303-741-7009.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Parkyn". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

John D. Parkyn, Chairman  
Private Fuel Storage L.L.C.

cc:

John Donnell

Jay Silberg

Sherwin Turk

Asadul Chowdhury

Scott Northard

Denise Chancellor

Richard E. Condit

John Paul Kennedy

Joro Walker