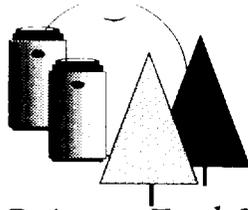


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Private Fuel Storage, L.L.C.

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John L. Donnell, P.E., Project Director

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

May 10, 1999

**COMMITMENT RESOLUTION LETTER #6**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

In accordance with our May 7, 1999 meeting held in the offices of the Nuclear Regulatory Commission in Rockville, Maryland, Private Fuel Storage submits the following resolution to NRC/CNWRA comments regarding the PFSF flooding analysis (second round safety RAI 2-3).

**NRC Comments**

- PFS needs to revise the flooding analysis for basin A to use a PMF flow of 85,000 cfs (CN=96 and TOC=11 hrs). Provide a drawing that defines the limits of the floodway for a flow of 85,000 cfs. Provide a drawing showing the profile of the access road and flood diversion berm and show the corresponding water elevations.
- PFS needs to revise the flooding analysis for basin B to calculate the PMF flow using CN=96 (current TOC=4.26 hrs is acceptable). Provide a drawing that defines the limits of the floodway for this new flow. Provide a drawing showing the profile of the rail line and flood diversion berm and show the corresponding water elevations.
- Provide a discussion concerning the design of the culverts or trestle that will be used under the rail line.
- Provide a discussion explaining that there will be no cross-flow between basin A and basin B.
- Provide a statement discussing the planned "freeboard" (berm height above maximum expected water level) for the flood diversion berms.

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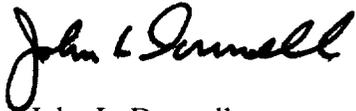
- Provide a discussion on erosion protection for the flood diversion berms.
- Add a cross-section to the flooding analysis that shows the elevation of the cask storage pads relative to the water elevation at this location.
- Provide a discussion and/or analysis that demonstrates that a breach of the access road or rail line during a PMF event will not increase downstream flood levels.
- Provide a definitive statement in the analysis that PMF flood levels will not contact the cask storage pads.

**PFS Response**

PFS will revise the flooding analysis to address the issues listed above. SAR figures will be provided that define the limits of the floodway for the new PMF flows and that show the profile of the rail line, access road, and flood diversion berms with the corresponding water elevations.

PFS plans to submit this revised analysis and supporting figures by May 14, 1999. If you have any questions regarding this response, please contact me at 303-741-7009.

Sincerely,



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

cc:

John Parkyn  
Jay Silberg  
Sherwin Turk  
Asadul Chowdhury  
Murray Wade  
Scott Northard  
Denise Chancellor  
Richard E. Condit  
John Paul Kennedy  
Joro Walker