

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

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 April 2, 1999

COMMITMENT RESOLUTION LETTER # 3 DOCKET NO. 72-22 / TAC NO. L22462 PRIVATE FUEL STORAGE FACILITY PRIVATE FUEL STORAGE L.L.C.

References: 1.

- 1. PFS Letter, Parkyn to Director, Office of Material Safety and Safeguards, Responses to Request for Additional Information, dated February 10, 1999
- 2. Geomatrix Consultants, Inc., Fault Evaluation Study and Seismic Hazard Assessment, Private Fuel Storage Facility, February 1999
- 3. Geomatrix Consultants, Inc., Development of Design Ground Motions for the Private Fuel Storage Facility, March 1999
- 4. Benson, A.K., and Baer, J.L., 1989, Gravity Survey for Skull Valley and Ripple Valley, Tooele County, Utah (from Utah State Technical Report for the Superconducting Super Collider, Appendix E, pp 1-18)

In accordance with our April 1, 1999 telephone call, Private Fuel Storage (PFS) submits the following resolution to NRC/CNWRA comments regarding recent PFS Safety RAI responses (Reference 1).

RAI's 2-5 and 2-7 (first round), Seismic Program

NRC Comment – The PFSF SAR (Appendix 2A) discusses a gravity survey that was performed by Dr. James Baer, BYU. The NRC requested that PFS provide data from this gravity survey. Also, gravity data that was used to support the Geomatrix Report (Reference 2) was requested.

PFS Resolution – The noted Baer gravity data (Reference 4) consist of gravity profiles in the northern part of Skull Valley. Baer's gravity data were not incorporated in the data set

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for the gravity map in the Geomatrix report (Reference 2, App. E). The profiles show similar gradients to the ones on the data set that were used in App. E. A copy of the applicable pages from Baer's report and the Bouguer Gravity Map (Plate E-1 of Reference 2) will be provided by April 8, 1999. The digitized format of the Plate E-1 data is being expeditiously pursued with the owner of the data and will be provided as soon as possible.

NRC Comment – The NRC requested more information concerning near field effects and directivity and how they are included in the probabilistic seismic hazards analysis.

PFS Resolution – The Geomatrix Report (Reference 3), that is being submitted with the PFS Request for Exemption to 10CFR72.102(f)(1) on April 2, 1999, addresses near field and directivity effects from faults in the vicinity of the PFSF. The ground motion attenuation models incorporate these effects.

NRC Comment – The recent PFS response to RAIs 2-5 and 2-7 only included seismic accelerations based on the probabilistic hazards analysis approach. The staff suggested that PFS also submit PGA values using the deterministic approach that includes the effects of the recently identified faults in the vicinity of the PFSF.

PFS Resolution – PFS plans to submit the results of this deterministic calculation by April 8, 1999.

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

John Donnell Project Director

Copy to:

John Parkyn
Jay Silberg
Sherwin Turk

Asadul Chowdhury

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Dr. Asadul H. Chowdhury, Manager Repository Design, Construction, and Operations Center for Nuclear Waste Regulatory Analyses (CNWRA) 6220 Culebra Road P.O. Drawer 28510 San Antonio, TX 78228 April 2, 1999

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TRANSMITTAL OF GEOMATRIX REPORT DOCKET NO. 72-22, TAC NO. L22462 PRIVATE FUEL STORAGE FACILITY PRIVATE FUEL STORAGE L.L.C.

As requested, please find enclosed an additional copy of the following Geomatrix Report:

• "Fault Evaluation Study and Seismic Hazard Assessment", Private Fuel Storage Facility, Skull Valley, Utah, Geomatrix Consultants, Inc, Volumes 1-3, February 1999

If you have any questions, please contact me at 303-741-7430.

Sincerely,

W. P. Hennessy

Assistant Project Manager

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Enclosures

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