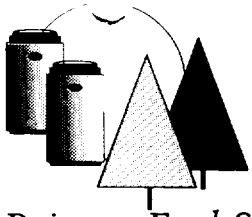
72-22



Private Fuel Storage, L.L.C.

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March 19, 1999

COMMITMENT RESOLUTION LETTER # 2
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.

Reference: PFS Letter, Parkyn to Director, Office of Material Safety and Safeguards, Responses to Request for Additional Information, dated February 10, 1999

In accordance with our March 18, 1999 telephone call, Private Fuel Storage submits the following resolution to NRC/CNWRA comments regarding recent PFS Safety RAI responses (Reference).

RAI 2-3 (second round), Flooding Analysis

NRC Comment – The PMF flow rate of 53,000 cfs appears low. "Back of the Envelope" calculations based on other methods indicated that it may be on the order of 150,000 cfs. PFS needs to provide further justification for their PMF approach and results . Two significant parameters that effect the PMF results are the time of concentration and soil conditions (eg, saturated vs non-saturated). PFS needs to justify the models and values used in the PMF calculation.

Also, the PMF analysis (Calculation G(B)-12) needs to consider the effect of the access road and flood diversion berm. Cross Sections A-2 and A-3 which show the water surface profiles should be revised to include the storage pad evaluation.

PFS Resolution - PFS has performed sensitivity studies on the effects of soil conditions and will provide results to show that the effects are minimal. The time of concentration analysis was based on the Hathaway model which considers the drag effect of vegetation on the flow rate. Justification for the use of the Hathaway model will be provided. Additional studies have been performed showing the effect of the berm; these will be finalized and submitted.

PFS plans to submit these additional explanations and studies by March 25, 1999.

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

John Donnell
Project Director

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