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Private Fuel Storage, L.L.C.

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March 17, 1999

COMMITMENT RESOLUTION
PRIVATE FUEL STORAGE FACILITY
DOCKET NO. 72-22 / TAC NO. L22462
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 16/17, 1999 telephone calls, Private Fuel Storage submits the following resolution to NRC/CNWRA comments regarding recent PFS Safety RAI responses (Reference).

1. **RAI 4-1 (second round), Thermal Analysis**

   NRC Comment – The PFSF SAR Section 4.2.1.5.2 and 4.2.2.5.2 identifies a design ambient temperature of 110 F, and RAI 4-1 stated: 'Justify the use of the referenced cask systems at a site where the ambient or off-normal conditions appear to be an unanalyzed temperature condition'. The PFS RAI response did not adequately address the issue.

   PFS Resolution - The 110 F referenced is a short-term maximum recorded local event. PFS believes that the response to the RAI addressed this issue, but will provide additional clarification to demonstrate that PFSF site ambient temperatures are enveloped by the Cask vendor's design parameters. PFS plans to submit this written explanation by March 24, 1999.

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2. RAI 2-5 (first round), Seismic Analysis

NRC Comment – Some of the equations provided by the Geomatrix report (Sections 6 and 7) in support of the response to RAI 2-5 are not clear with respect to some of the variables used. Also, equations used in conjunction with the Yucca Mountain studies are not clear as to their applicability to the PFSF site.

PFS Resolution – Geomatrix will provide a written explanation of each of the equations (and variables) used. Geomatrix will also provide a written discussion on the applicability of the Yucca Mountain studies to the PFSF site. PFS plans to submit this information by March 24, 1999.

3. RAI 8-2 (second round), Onsite Explosion Analysis

NRC Comment – The PFS SAR (Chapter 8) has adequately evaluated the effects of offsite explosions, but not onsite explosions. The PFSF site will have vehicles and a backup generator using diesel fuel with diesel fuel storage tanks, and building heating systems using propane storage tanks that should be considered.

PFS Resolution – PFS will prepare an assessment of onsite explosions based on the methodology from Reg Guide 1.91 and submit the results. PFS plans to submit this written response by March 24, 1999.

4. RAI's 2-1 & 2-2 (second round), Geotechnical Program

NRC Comment – The PFS field geotechnical investigation program is limited in the number of borings and tests provided. PFS should perform an evaluation of the Standard Penetration Test blow counts (N-values), individually, rather than averaged over 5-ft intervals, to demonstrate that the variability in N-values across the site is not significant. Atterberg Limits, shear strength, and compressibility should also be addressed.

PFS Resolution – PFS will review the variability of N-values across the site and provide a written report of the results. PFS plans to submit this information by March 24, 1999. PFS will also review the available soil samples in the laboratory and perform additional analysis on these samples, providing profiles for Atterberg limits and correlations for shear strength and compressibility. PFS plans to submit this information by March 31, 1999.

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

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