

Private Fuel Storage, L.L.C.

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

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

July 22, 1999

COMMITMENT RESOLUTION LETTER #10
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.

Reference: 1. PFS Letter, Parkyn to Delligatti, Request for Exemption to 10 CFR 72.102(f)(1) Seismic Design Requirement, dated April 2, 1999.

In accordance with our July 21, 1999 telephone call, Private Fuel Storage (PFS) submits the following resolution to NRC/CNWRA comments regarding the Private Fuel Storage Facility (PFSF) seismic analysis and the aircraft crash hazard assessment at the PFSF.

SEISMIC ANALYSIS

The following requests for additional information regarding the PFSF seismic analysis were made during the 7/21/99 teleconference:

NRC Comments

1. For the original deterministic analysis (1997), PFS should provide horizontal and vertical Peak Ground Acceleration (PGA) at the 50th percentile.
2. For the updated deterministic analysis (1999), PFS should provide horizontal and vertical PGA at the 50th percentile.
3. For the probabilistic analysis (1999), PFS should provide horizontal and vertical PGA for the 2000-yr return period.

PFS Response

1. PGA values at the 50th percentile for the original deterministic analysis (1997) are provided in Attachment 1.
2. PGA values at the 50th percentile for the updated deterministic analysis (1999) are provided in Attachment 1.

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3. For the probabilistic analysis (1999), PGA values for the 2000-yr return period were provided in Table 1 of the Geomatrix report entitled "Development of Design Ground Motions for the Private Fuel Storage Facility" transmitted in Reference 1. These values are repeated in Attachment 1.

AIRCRAFT CRASH HAZARD ASSESSMENT AT THE PFSF

The NRC raised the following issues concerning the aircraft crash hazard assessment performed by PFS for the Private Fuel Storage Facility during the 7/21/99 teleconference:

NRC Comments

1. Although the current practice is for F-16s to fly down the East side of Skull Valley, five miles from the PFSF site, the F-16s are not physically or legally constrained to follow this route. PFS should seek to determine whether a standing military order or procedure exists concerning avoidance of nuclear facilities that would apply here and would require the F-16s flying down Skull Valley to avoid the PFSF. Alternatively, PFS should show that the F-16 flights do not pose a significant hazard to the PFSF, assuming their paths through Skull Valley are not constrained.
2. PFS has stated that only 70 percent of the total aircraft sorties on the Utah Test and Training Range (UTTR) are flown by F-16s (June 30 Submission, p. 16). Furthermore, PFS has stated that there were a total of 8,711 sorties flown on the UTTR in 1998 (including the 3,871 F-16 flights down Skull Valley) (Cole Report dated June 3, 1999, p. 20). PFS should show that the aircraft sorties flown on the UTTR in addition to the F-16 flights down Skull Valley would not pose a significant crash hazard to the PFSF.
3. PFS's response to RAI 8-2 indicates that aircraft returning to Hill Air Force Base from the UTTR may use the Stansbury and Moser recovery routes, which may take them over or near the PFSF site. PFS should show that aircraft flying those routes would not pose a significant crash hazard to the PFSF.
4. In order to address an issue raised by the State of Utah, PFS should show that air crashes involving military helicopter flights would not pose a significant hazard to the PFSF.
5. PFS should provide a reference that indicates that the crash rates for large military transport aircraft are similar to those for civilian commercial aircraft.
6. PFS should provide a source for the Attachment E provided with the submission of June 30, 1999.

July 22, 1999

PFS Response

PFS is currently reviewing items 1-5 and will provide an additional commitment letter on July 26, 1999 which will outline our plan of action and provide a completion date for these items.

6. The source for Attachment E provided with the submission of June 30, 1999 is Item 2 to the January 20, 1999 Response by the Department of the Air Force, Headquarters Ogden Air Logistics Center (AFMC), Hill Air force Base, to the December 18, 1998 Freedom of Information Act Request filed by General Cole.

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.

Attachments

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

ATTACHMENT
Sheet 1 of 4

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July 22, 1999
Project 4790.01

Mr. Jerry Cooper
Stone & Webster Engineering Corporation
P.O. Box 5406
Denver, CO 80217-5406

Subject: 50th Percentile Ground Motions

Dear Jerry:

In response to the request made by the U.S. Nuclear Regulatory Commission in the teleconference on July 21, 1999 we are providing the 50th percentile peak ground acceleration (PGA) values for the deterministic ground motion assessments conducted for the Private Fuel Storage site in Skull Valley, Utah.

Deterministic Ground Motion Assessment Conducted in 1997¹

The 50th percentile PGA values are 0.43g horizontal, 0.39g vertical.

Deterministic Ground Motion Assessment Conducted in 1999²

The 50th percentile PGA values are 0.44g horizontal, 0.43g vertical.

2000-Year Return Probabilistic Ground Motions Developed in 1999³

The 2,000-year return period PGA values are 0.528g horizontal, 0.533g vertical.

The response spectra associated with these motions are compared on the attached figures for the horizontal fault-normal, horizontal fault-parallel, and vertical directions.

Sincerely yours,
GEOMATRIX CONSULTANTS, INC.

Robert R. Youngs
Principal Engineer

A handwritten signature in black ink, appearing to read "Robert R. Youngs", written over the typed name.

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Enclosure: Figures 1-3

- 1 Geomatrix Consultants, Inc. and William Lettis and Associates, Inc. (1997) Deterministic earthquake ground motion analysis, Private Fuel Storage Facility, Skull Valley, Utah: Report prepared for Stone & Webster Engineering Corporation, CS-028233 J.O. No. 0599601-005, March.
- 2 Geomatrix Consultants, Inc. (1999) Update of deterministic ground motion assessments, Private Fuel Storage Facility, Skull Valley, Utah: Report prepared for Stone & Webster Engineering Corporation, April.
- 3 Geomatrix Consultants, Inc. (1999) Development of design ground motions for the Private Fuel Storage Facility, Skull Valley, Utah: Report prepared for Stone & Webster Engineering Corporation, Table 1, March.

ATTACHMENT 1
Sheet 2 of 4

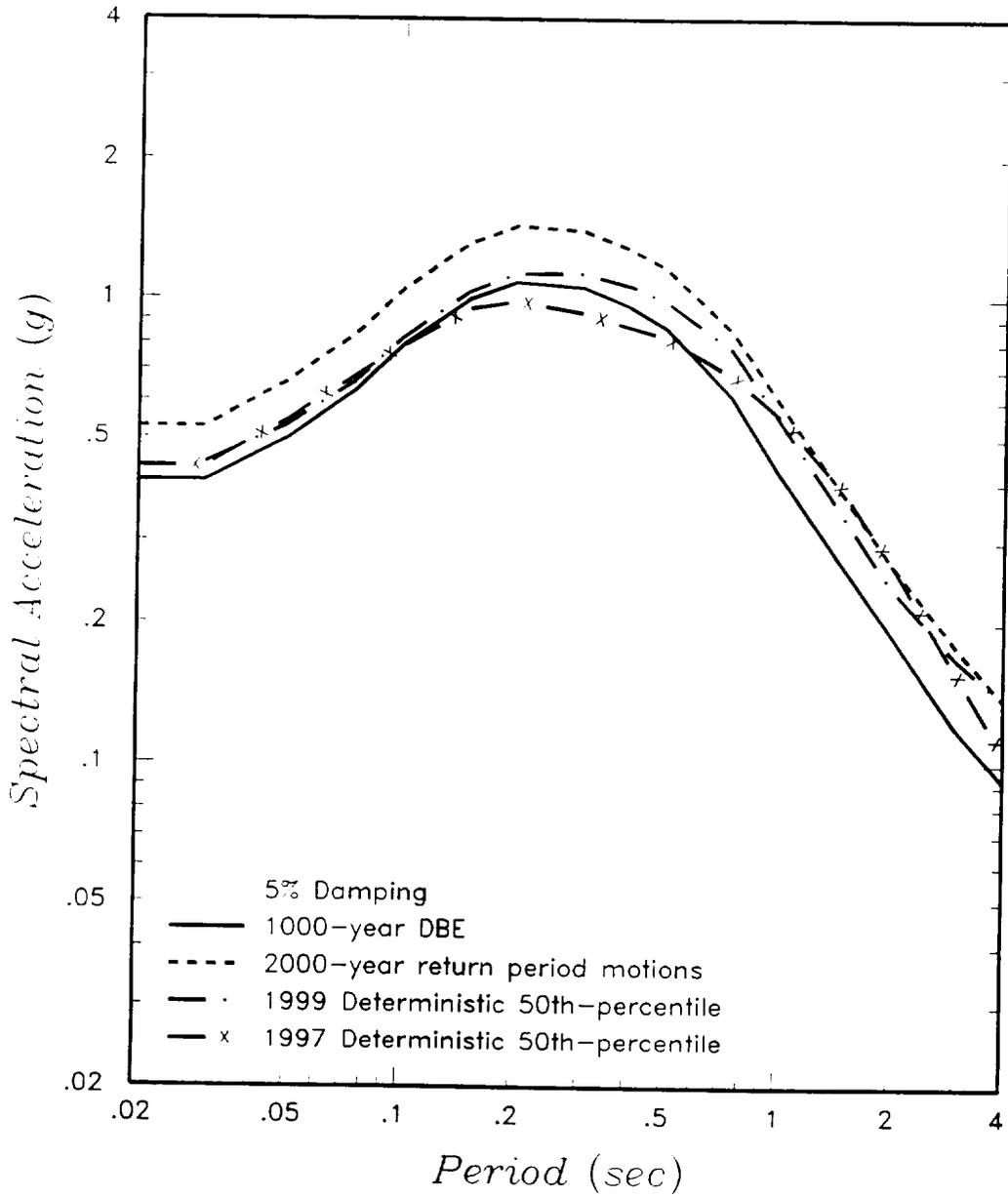


Figure 1 Horizontal Fault-normal Response Spectra

ATTACHMENT 1
Sheet 3 of 4

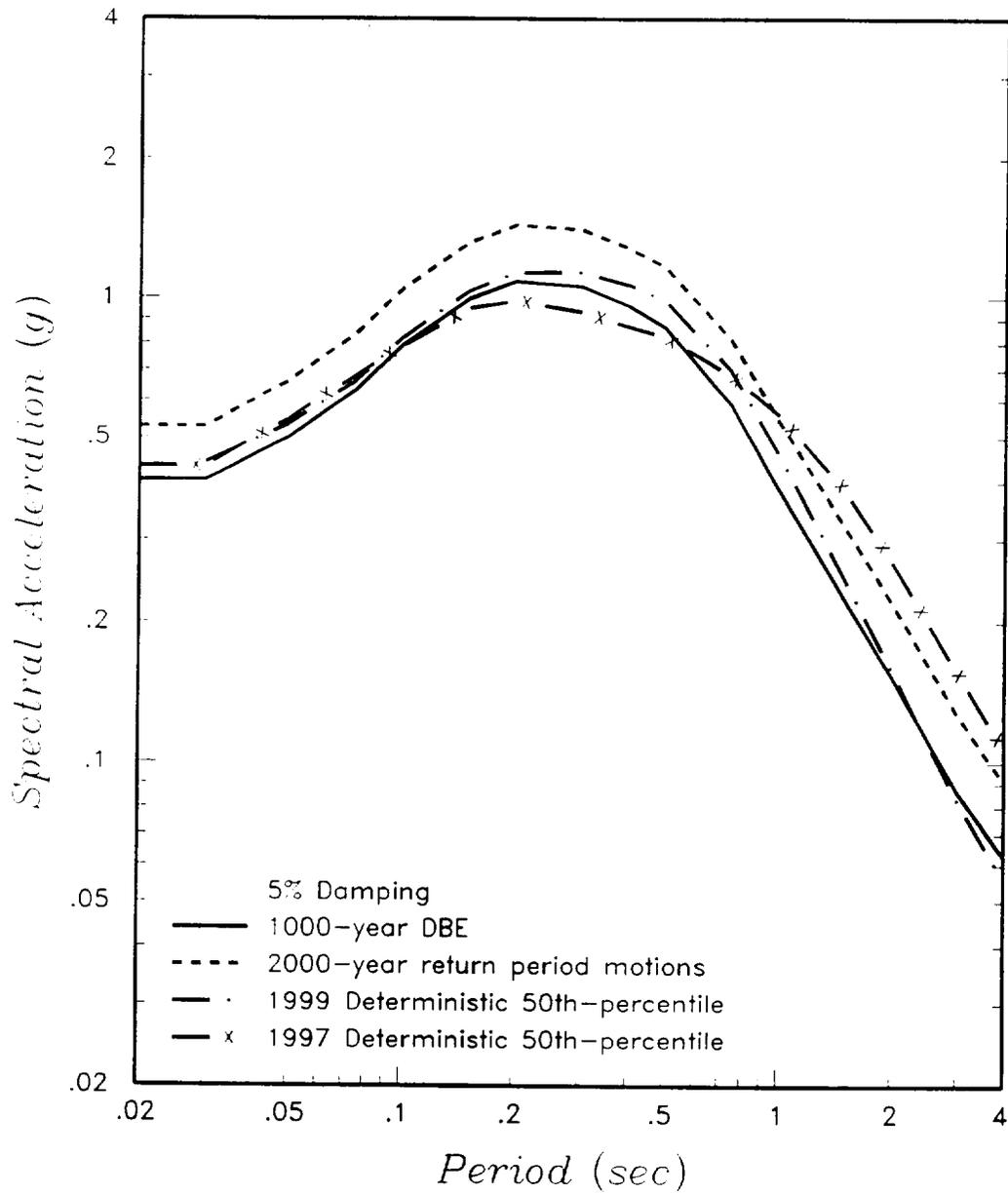


Figure 2 Horizontal Fault-parallel Response Spectra

ATTACHMENT 1
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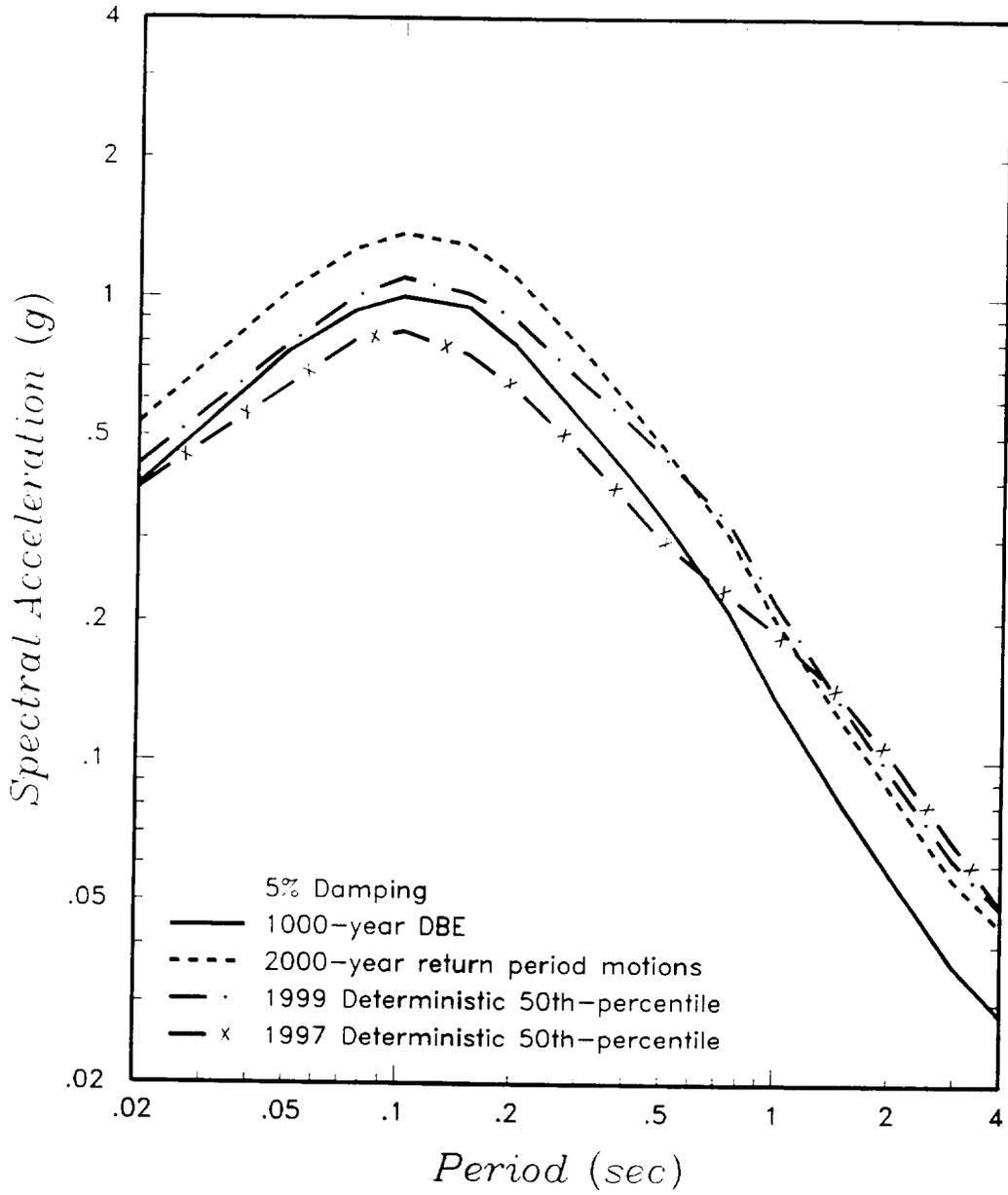


Figure 3 Vertical Response Spectra