



*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 9, 1999

**SUBMITTAL OF COMMITMENT RESOLUTION LETTER #8 INFORMATION  
DOCKET NO. 72-22 / TAC NO. L22462  
PRIVATE FUEL STORAGE FACILITY  
PRIVATE FUEL STORAGE L.L.C.**

In accordance with our July 7, 1999 telephone call, Private Fuel Storage (PFS) submits the following resolution to NRC/CNWSA comments regarding the seismic analysis for the Private Fuel Storage Facility (PFSF).

**NRC Comment**

Revision 3 of the Safety Analysis Report (SAR) revised the methodology for calculating the design earthquake from a deterministic approach to a probabilistic risk-informed approach and removed the previous discussion on the original deterministic analysis. PFS should resubmit this original deterministic analysis so that it is available for comparison with the new probabilistic approach.

**PFS Response**

The original deterministic analysis is currently discussed in SAR Section 8.2.1.1 and the actual analysis, performed by Geomatrix Consultants, Inc., is now listed in SAR Section 8.4 as Reference No. 28. This analysis is included as Attachment A to this response.

**NRC Comment**

PFS should provide an explanation of the basis for using a 1000-year return period for determining design basis ground motion as discussed in SAR Section 2.6.2.3.

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**PFS Response**

An explanation of the basis for using a 1000-year return period for determining design basis ground motion is provided as Attachment B to this response.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Donnell". The signature is fluid and cursive, with the first name "John" being more prominent.

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

**Attachments**

Copies to:  
Mark Delligatti  
John Parkyn  
Jay Silberg  
Sherwin Turk  
Asadul Chowdhury  
Murray Wade  
Scott Northard  
Denise Chancellor  
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