RAS 4858

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	Docket No. 72-22-ISFSI
PRIVATE FUEL STORAGE, LLC (Independent Spent Fuel Storage Installation)	)	ASLBP No. 97-732-02-ISFSI
	)	September 11, 2002

ERRATA TO STATE OF UTAH'S FINDINGS OF FACT AND CONCLUSIONS OF LAW ON UNIFIED CONTENTION UTAH L/QQ

In meeting the September 5, 2002 deadline for filing Proposed Findings of Fact and Conclusions of Law on Unified Contention Utah L/QQ, a number of typographical, grammatical and punctuation errors in the final document escaped our notice. The attached errata corrects some of these errors, in particular, those that affect the readability of the document.

DATED this 11th day of September, 2002.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of ERRATA TO STATE OF UTAH'S FINDINGS OF FACT AND CONCLUSIONS OF LAW ON UNIFIED CONTENTION UTAH L/QQ was served on the persons listed below by electronic mail (unless otherwise noted) with conforming copies by United States mail first class, this 11th day of September, 2002:

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ERRATA TO STATE OF UTAH'S FINDINGS OF FACT AND CONCLUSIONS OF LAW ON UNIFIED CONTENTION UTAH L/QQ

Pg	¶	Ln	Correction
25	14	3	strength upon the direction of shear is known as shear anisotropy.
33	36	1	We have noted that the three to thirteen foot thick upper Bonneville
38	52	3	data to undrained shear strength, the Board is unconvinced that such
46	72	6	is also required before the material to can be classified as soil
54	97	5	efficient placement of cement-treated soil lifts, this will negatively ~~effect~~ affect interface bonding,
57	105	5	compressive strengths of soil cement and cement-treated soil to resist ~~founding~~ foundation sliding just
64-65	128	11	nuclear power plant is being built in conformity with the Commission's safety regulations.
69	139	3	The HI-STORM 100 ~~casks~~ cask is the only storage cask presently
69	139	5	related items, such as the HI-TRAC transfer casks and HI-STORM transportation casks, ~~is~~ will yield
81	171	2	have evolved[;] often in response to cost cutting measures, and have
82	172	3	the eolian silts to save costs. ~~PFS~~ State Exh. 210, internal memo
83	177		Place the paragraph before the heading "Board Finding" and change the paragraph number to 176.
83	176		Change the paragraph number to 177.
94	204	4	purposes of structural design, such as to estimate the amount of steel
96	210	7	Tr. (~~FO~~ Ostadan) at 10340.
99	218	18	significant transfer of lateral forces even without initial ~~of~~ pad
105	237	11	shape, with the middle deforming more in the sides ~~then~~ than at the
107	242	2	dynamic analysis calculation, PFS Exh. VV "inasmuch as the loads came from ~~out~~ our structural
110	247	1,2	Based on the evidence presented, PFS has not met ~~it~~ its burden of showing that the storage pads, the CTB, their foundation[s] systems,

Pg	¶	Ln	Correction
115	258	FN 38, ln 3	in 2002. *See* footnote _35_ *supra.* In addition to the HI-STORM 100 cask system, Holtec
116	260	6	the weight to accord their testimony and other ~~the~~ evidence relevant
116-117	261	8	principals and methods and; d) whether the witness has applied the principles and methods reliably to
123	275	2	level of ground motion increases (zero period acceleration) ~~level~~.
140	318	9	limitations or vertical uplift limitations if the center of gravity remains within acceptable limits.
152	352	9	cask animations are inconclusive as to which damping ratio best
153	355	2,3	threshold value, the response ~~is~~ (viz. maximum tilting of the cask axis) increases rapidly with increase in the [zero period acceleration] level."[FN] State's Exh. 174, ~~*Seimic*~~ *Seismic Response*
160	373	1	Moreover, the ~~November 1997~~ March 1998 Holtec letter to
165	383	8	at Fig. 1.3; Con-SER at 17-1. The role of the industry panel members ~~is~~ was to provide
165	383	14	provided comments on the completed 2,000-year analysis for PFS at the November ~~2002~~ 2001
168	390	5	San Onofre ISFSIs[~~,~~] . ~~we~~ We find that the record bare in its
168-169	392	5,6	cement-treated soil and a relative soft clay foundation at ground motions equal to or greater ~~to~~ than the 2,000-year earthquake at PFS.
169	395	2	and some of the other important ~~imput~~ input parameters ~~or~~ are
172	402	2	on a pad is adequate because ~~that~~ cask rotations will be larger if the ~~casks~~ cask's movement is in
172	402	8	casks on a pad actually behave independently of other casks on the
173	405	4	Id. at 6770. Figure 17 is raw data analysis results ~~to~~ which compare
173-174	408	5	of our tasks to develop [an] applicable [sic, appletical ~~[sic]~~ analysis model that can be used by
181	438	2	of the expected seismic conditions at the PFS site and does not satisfy ~~the~~ using multiple time

Pg	¶	Ln	Correction
182	441	11	results cannot be directly compared yet ~~both~~ the Applicant and Staff both claim they confirmed
184	445	3,4	nonlinear computer analyses. Additionally, the Applicant has not met its burden that Holtec's nonlinear finite element cask stability results for both the 2,000-year and 10,000-year earthquakes are not substantially altered based on our preceding findings ~~that the Applicant has not met it burden~~ that a) there is no engineering precedence or seismic
184	445	6	behavior of the storage pad, c); there is ample evidence to suggest
184	445	9-11	that there can be significant forces transferred from pad-to-pad. ~~; do not substantially alter Holtec's nonlinear finite element cask stability results for both the 2,000-year and 10,000-year earthquakes, t~~ The Licensing Board further finds uncertainty in the calculated maximum
225	528	4-6	nor any other witness has ~~not~~ performed any foundation stability calculations for a 10,000-year mean return period earthquake and ~~has not~~ shown that the foundations meet a factor of safety of
233	552	4	identified deficiencies were: ~~(a)~~ incorrect assumptions regarding the
246	587	6	you would argue that yeah, maybe 4,000 is not ~~they~~ the way to go.
247	7[1]	1	The Applicant has not shown that there are adequate conservatisms
248	8[1]	1	~~8~~ 9. Looking at lifetime risk for the expected 40 year design life
248	9[1]	1	~~9~~ 10. The Staff did not consider the public interest in its review
248	3[2]	1	3. may ~~effect~~ affect health and safety from the release of

[1] *See* "E. Summary" of the Seismic Exemption Request section.

[2] *See* "F. Conclusions of Law" of the Seismic Exemption Request section.