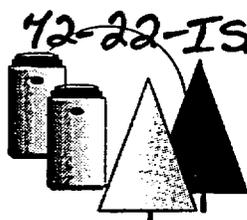
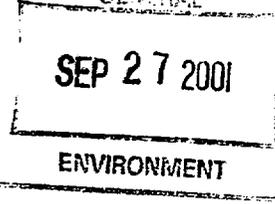


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Private Fuel Storage, L.L.C.

72-22-ISFSI - State Exhibit 136 - ATTORNEY GENERAL Rec'd 6/25/02



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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

September 25, 2001

**EIS COMMITMENT RESOLUTION LETTER #13**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

Reference: September 24, 2001 telephone call between the NRC and Stone and Webster (S&W)

During the above referenced telephone call, Mr. Mike Waters of the NRC requested that Private Fuel Storage L.L.C. (PFS) include a change to Section 4.2.9.1.1 of the Private Fuel Storage Facility (PFSF) Environmental Report (ER) in the next amendment to the PFSF License Application. ER Section 4.2.9.1.1 states the following:

“As described in Section 7.6 of the PFSF SAR, a maximum dose rate of 2.10 mrem/yr (assuming a 2,000 hour annual occupancy) was calculated at the OCA boundary fence 600 meters from the RA fence at its closest points of approach. This dose rate is comprised of direct and scattered gamma and neutron radiation assumed to emanate from 4,000 HI-STORM storage casks and is based on the assumption that all 4,000 casks contain typical fuel expected to be received at the PFSF with 35-GWd/MTU burnup and 20-year cooling time.”

The PFSF storage cask array dose assessment evaluated dose rates at the north and west owner controlled area (OCA) boundaries, both of which are a minimum distance of 600 meters out from the restricted area fence. The dose assessment determined that the maximum dose rate occurs at the north OCA boundary. Section 7.3.3.5 of the PFSF SAR presents dose rates from the PFSF cask array at the OCA boundary, based on the full complement of 4,000 HI-STORM storage casks, assuming that all the casks contain 1) relatively hot fuel having 40 GWd/MTU burnup and 10-year cooling time, and 2) fuel having 35 GWd/MTU burnup and 20-year cooling time, which is considered to be representative of typical fuel expected to be received at the PFSF as explained in SAR Section 7.3.3.5. The dose rates at the OCA boundary for the relatively hot fuel were calculated to be 5.85 mrem/yr at a point on the boundary 600 meters north of the RA

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Exhibit 136  
SECY-02

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CLEAR REGULATORY COMMISSION

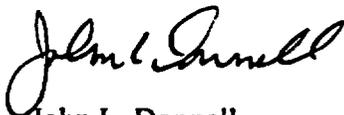
Docket No. \_\_\_\_\_ Official Exh. No. 136  
in the matter of PPS  
Staff \_\_\_\_\_ IDENTIFIED   
Applicant \_\_\_\_\_ RECEIVED   
Intervenor  REJECTED \_\_\_\_\_  
Other \_\_\_\_\_ WITHDRAWN \_\_\_\_\_  
DATE 6-25-02 Witness \_\_\_\_\_  
Clerk pmf

fence, and 4.35 mrem/yr at a point on the boundary 600 meters west of the RA fence, assuming a hypothetical individual spends 2,000 hours per year at the OCA boundary. Dose rates will be lower at points along the south and east sides of the OCA boundary, since these points are further from the storage casks than the north and west OCA boundaries. The annual dose at the north OCA boundary (maximum) for typical fuel expected to be received at the PFSF (having 35 GWd/MTU burnup and 20-year cooling time) was calculated to be 2.10 mrem, again assuming that a hypothetical individual spends 2,000 hours per year at the boundary. Section 4.2.9.1.1 of the ER identifies the 2.10 mrem annual dose at the OCA boundary, based on the stated assumption that all 4,000 casks contain typical fuel expected to be received at the PFSF with 35-GWd/MTU burnup and 20-year cooling time. The NRC requested that PFS revise this section of the ER to include the higher calculated annual dose of 5.85 mrem, based on the assumption that all 4,000 HI-STORM storage casks contain the relatively hot fuel assumed to have 40 GWd/MTU burnup and 10-year cooling time.

PFS will revise ER Section 4.2.9.1.1 to incorporate the 5.85 mrem calculated annual dose at the OCA boundary that is based on the assumption that all 4,000 storage casks contain the relatively hot fuel, and PFS will make a similar revision to SAR Section 7.6, which contains essentially the same information as ER Section 4.2.9.1.1. These revisions will be included in the next amendment to the PFSF License Application.

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.

Copy to (with enclosure):

Mark Delligatti  
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Sherwin Turk  
Greg Zimmerman  
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Denise Chancellor  
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Joro Walker