

Private Fuel Storage, LLC

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John D. Parkyn, Chairman of the Board

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July 19, 2003

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**Probability Assessment of the Aircraft Crash Impact Hazard
for the Private Fuel Storage Facility Based on Engineering
Evaluations of Storage Cask and Canister Transfer Building
Structural Integrity
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.**

References: 1. June 16, 2003 NRC Staff and PFS Meeting

As discussed at the June 16, 2003 meeting, Private Fuel Storage (PFS) is providing the NRC Staff a copy of one of its expert reports for the consequences hearing. The report concerns the Probability Assessment of the Aircraft Crash Impact Hazard for the Private Fuel Storage Facility Based on Engineering Evaluations of Storage Cask and Canister Transfer Building Structural Integrity. This report analyzes the aircraft crash and jettisoned ordnance impact hazards to the Private Fuel Storage Facility ("PFSF") to show that the risk of exceeding 10 C.F.R. § 72.106(b) radiation dose limits at the PFSF boundary in the event of an impact at the facility is less than 10^{-6} per year. Engineering evaluations performed by PFS's technical experts, submitted under separate cover letters, have analyzed potential aircraft crash and jettisoned ordnance impact events at the PFSF that would not result in a loss of confinement integrity of the multi-purpose canisters ("MPCs") that contain the spent nuclear fuel at the PFSF and prevent the escape of radioactive materials contained in the spent fuel to the environment. These analyzed events can therefore be excluded from the aircraft crash probability impact hazard for the PFSF site, as established by the Atomic Safety and Licensing Board (LBP-03-04, March 10, 2003). Only the residual, unscreened or unanalyzed events could possibly have consequences involving loss of confinement and hence a potential release of radioactivity. Therefore, in assessing the potential hazard to the PFSF posed by aircraft crashes, the probability of occurrence of analyzed events can be subtracted from the probability of all aircraft crash and jettisoned ordnance impacts. If the

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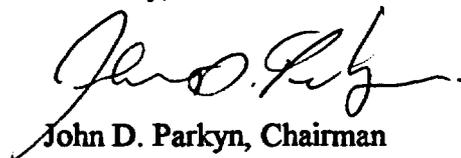
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be subtracted from the probability of all aircraft crash and jettisoned ordnance impacts. If the resulting residual probability is less than 10^{-6} per year, then aircraft crashes and jettisoned ordnance impacts are not credible events and their effects do not need to be considered in the design of the PFSF. This report calculates this residual probability and demonstrates that it is well below the 10^{-6} per year threshold; thus no further evaluation of these events is necessary.

In accordance with the Staff's request at the June 16 meeting, PFS has preliminarily marked and is submitting the report as if it contains Safeguards Information in order to allow the Staff to make a determination whether parts or all of the report should be designated as containing Safeguards Information. In accordance with the modified protective order entered by Atomic Safety and Licensing Board on June 26, 2003, we are also providing copies of the report directly to lead counsel for the Staff (Sherwin Turk) and the State (Denise Chancellor) and to the members of the Licensing Board.

If you have any questions regarding this submittal, please contact me at 608-787-1236 or Mr. J. L. Donnell, Project Director, at 303-741-7009.

Sincerely,



John D. Parkyn, Chairman
Private Fuel Storage L.L.C.

cc: Michael C. Farrar, Esq. (1 copy of Report)
Dr. Jerry R. Kline (1 copy of Report)
Dr. Peter S. Lam (1 copy of Report)
Sherwin E. Turk, Esq. (1 copy of Report)
Denise Chancellor, Esq. (2 copies of Report)