



## INTERIM STORAGE PARTNERS

June 8, 2018  
E-51587

Director, Division of Spent Fuel Management  
Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Subject: Submittal of License Application Revision 2 and Request to Restart  
Review of Application for Approval of the WCS CISF, Docket 72-1050

- Reference:
1. Letter from J. Scott Kirk (WCS) to Mark Lombard (NRC), License Application to Construct and Operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel and Reactor-Related Greater Than Class C (GTCC) Low-Level Waste in Andrews County, Texas, dated April 28, 2016
  2. Letter from Mark Lombard (NRC) to Michael Ford (WCS), "License Application To Construct And Operate A Consolidated Interim Storage Facility For Spent Nuclear Fuel In Andrews County, Texas – Accepted For Review (CAC NO. L25175)", January 26, 2017.
  3. Letter from Michael Ford (WCS) to Michael Layton (NRC), Submittal of Revision 1 to the WCS License Application Requesting Authorization to Construct and Operate a Consolidated Interim Storage Facility (CISF) for Spent Nuclear Fuel and Reactor-Related Greater Than Class C (GTCC) Low-Level Waste in Andrews County, Texas, dated March 16, 2017.
  4. Letter from Rod Baltzer (WCS) to NRC Document Control Desk, Request to Temporally Suspend All Safety and Environmental Review Activities Related to the WCS Consolidated Interim Storage Facility Application for Spent Nuclear Fuel in Andrews County, Texas, dated April 18, 2017.

Waste Control Specialists LLC filed an Application with the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR Part 72 for a license that would allow it to construct and operate the WCS Consolidated Interim Storage Facility (WCS CISF) in Andrews

County, TX, Docket No. 72-1050 (Reference 1). Following Waste Control Specialists' responses to Requests for Supplemental Information (RSIs), the NRC accepted the License Application for review (Reference 2). Waste Control Specialists thereafter submitted Revision 1 (Reference 3) of the License Application to the NRC to incorporate the changes made in response to the NRC's RSIs. In April 2017, Waste Control Specialists subsequently requested that the NRC temporarily suspend the review of the License Application (Reference 4).

Subsequent to the Waste Control Specialists' request to suspend the review of the License Application, its parent (Valhi, Inc.) sold it to J.F. Lehman & Company in January 2018. In addition, Waste Control Specialists and Orano CIS LLC (a subsidiary of Orano USA) formed a joint venture, Interim Storage Partners LLC (ISP), whose purpose is to complete the licensing of, and then construct and operate, the WCS CISF. The ISP joint venture provides for a stronger project delivering predictability and taking advantage of the strong nuclear design, licensing, construction and operations experience that the two companies bring to the venture.

As a result of the ISP joint venture, the role and responsibilities as Applicant for the license that would permit the Applicant to construct and operate the WCS CISF in Andrews County, Texas is passed from Waste Control Specialists to ISP. However, Waste Control Specialists continues to support the project in much the same way, including providing access to the land for the WCS CISF, operational support, and waste disposal.

ISP requests that the NRC resume all safety and environmental review activities associated with the License Application that would permit ISP to construct and operate the WCS CISF associated with Docket No. 72-1050. Because of the change in ownership of the WCS CISF from Waste Control Specialists to ISP, ISP submits this Revision 2 of the License Application, including revisions of the Safety Analysis Report (SAR) and Environmental Report (ER), for use by the NRC in its resumption of the review of the License Application.

Earlier activities by Waste Control Specialists necessary to support the License Application are adopted by ISP, and the revised License Application refers to ISP as if it performed those activities. ISP retains the nomenclature of "WCS CISF" for the facility. Revision 2 changes to the License Application documents are tracked with italicized text and revision bars in the right margin to provide NRC staff reviewers and the public with a convenient way to identify the changes made since Revision 1.

The changes in Revision 2 primarily are made to:

1. Reflect that ISP has adopted the TN Americas (TN Americas LLC is a subsidiary of Orano USA) Quality Assurance Program for the WCS CISF.
2. Change the Applicant from Waste Control Specialists to ISP, including
  - a. an updated business structure and organization chart and
  - b. an updated financial information/assurance.
3. Include an alternative that ISP may contract with Spent Nuclear Fuel title holders other than the U.S. Department of Energy.

This submittal contains proprietary information, which may not be used for any purpose other than NRC staff review of the License Application. In accordance with 10 CFR 2.390, I am providing affidavits specifically requesting the protection of proprietary information from disclosure. Public versions of the proprietary SAR parts are provided.

The following enclosures are included:

1. ISP Application for a License for a Consolidated Interim Spent Fuel Storage Facility Revision 2
2. WCS Consolidated Interim Storage Facility System Safety Analysis Report, Revision 2 (Proprietary Version)
3. WCS Consolidated Interim Spent Fuel Storage Facility Environmental Report, Revision 2
4. Affidavits Pursuant to 10 CFR 2.390
  - a. Waste Control Specialist LLC
  - b. NAC International
  - c. TN Americas (E-51587)
5. WCS Consolidated Interim Storage Facility System Safety Analysis Report, Revision 2 (Non-proprietary Version)

With the exception of the Physical Security Plan and the Safeguards Contingency Plan, other documents that were submitted with License Application Revision 1 do not need to be revised and remain applicable to the License Application. The revised Physical Security Plan and Safeguards Contingency Plan will be submitted in the near future under separate cover letter because these documents contain Safeguards Information.

ISP requests that the NRC expeditiously restart its review of the License Application, including completion of the environmental scoping period and restart of the hearing process. Following Waste Control Specialists' request to temporarily suspend the proceeding, Waste Control Specialists and the NRC staff jointly requested Commission approval to withdraw the *Federal Register* notice providing an opportunity to submit hearing requests on the License Application. The Commission granted that request on June 22, 2017 (Order CLI-17-10) and directed the NRC staff to publish a new notice of opportunity to request a hearing in the *Federal Register* if requested to resume review of the License Application. Importantly, the Commission declined to extend the 60-day period specified in 10 CFR 2.309(b) for hearing requests. Additionally, although the Commission concluded that the NRC staff should reopen the scoping comment period, it declined to specify an extended comment period. Given the minimal changes and the near completion of the scoping period, ISP requests that the NRC staff notice only a minimal scoping period.

Should you have any questions regarding this License Application, please contact Mr. Jack Boshoven by telephone at (410) 910-6955, or by email at [jack.boshoven@orano.group](mailto:jack.boshoven@orano.group).

ISP is submitting this Revision to the License Application under oath or affirmation. Accordingly, pursuant to 10 CFR 72.16(b), I declare under penalty of perjury that the information contained herein is true and correct to the best of my knowledge.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Isakson', with a long horizontal flourish extending to the right.

Jeffery D. Isakson  
Chief Executive Officer/President  
Interim Storage Partners LLC

cc: John (Chau) N. Nguyen (NRC SFM) as follows, all provided in a separate mailing:

Enclosures:

1. ISP Application for a License for a Consolidated Interim Spent Fuel Storage Facility Revision 2
2. WCS Consolidated Interim Storage Facility System Safety Analysis Report, Revision 2 (Proprietary Version)
3. WCS Consolidated Interim Spent Fuel Storage Facility Environmental Report, Revision 2
4. Affidavits Pursuant to 10 CFR 2.390
  - a. Waste Control Specialists LLC
  - b. NAC International
  - c. TN Americas
5. WCS Consolidated Interim Storage Facility System Safety Analysis Report, Revision 2 (Non-proprietary Version)

**Document Components:**

001 PUBLIC ISP Transmittal Letter.pdf, 261,170 bytes  
002 PUBLIC Enc 1 Application for License.pdf, 15,924,428 bytes  
003 SUNSI Enc 2 SAR Rev 2 01 of 26 Cover to Ch 1.pdf, 18,911,223 bytes, Proprietary  
004 SUNSI Enc 2 SAR Rev 2 02 of 26 Ch 2 1 of 2.pdf, 70,405,589 bytes, Proprietary  
005 SUNSI Enc 2 SAR Rev 2 03 of 26 Ch 2 2 of 2.pdf, 68,559,092 bytes, Proprietary  
006 SUNSI Enc 2 SAR Rev 2 04 of 26 Ch 2 Attach A.pdf, 12,298,493 bytes, Proprietary  
007 SUNSI Enc 2 SAR Rev 2 05 of 26 Ch 2 Attach B 1 of 5.pdf, 68,243,578 bytes, Proprietary  
008 SUNSI Enc 2 SAR Rev 2 06 of 26 Ch 2 Attach B 2 of 5.pdf, 70,433,620 bytes, Proprietary  
009 SUNSI Enc 2 SAR Rev 2 07 of 26 Ch 2 Attach B 3 of 5.pdf, 62,853,295 bytes, Proprietary  
010 SUNSI Enc 2 SAR Rev 2 08 of 26 Ch 2 Attach B 4 of 5.pdf, 73,100,649 bytes, Proprietary  
011 SUNSI Enc 2 SAR Rev 2 09 of 26 Ch 2 Attach B 5 of 5.pdf, 72,352,851 bytes, Proprietary  
012 SUNSI Enc 2 SAR Rev 2 10 of 26 Ch 2 Attach C.pdf, 9,829,302 bytes, Proprietary  
013 SUNSI Enc 2 SAR Rev 2 11 of 26 Ch 2 Attach D.pdf, 71,501,245 bytes, Proprietary  
014 SUNSI Enc 2 SAR Rev 2 12 of 26 Ch 2 Attach E.pdf, 28,090,463 bytes, Proprietary  
015 SUNSI Enc 2 SAR Rev 2 13 of 26 Ch 2 Attach F 1 of 3.pdf, 68,395,130 bytes, Proprietary  
016 SUNSI Enc 2 SAR Rev 2 14 of 26 Ch 2 Attach F 2 of 3.pdf, 61,949,539 bytes, Proprietary  
017 SUNSI Enc 2 SAR Rev 2 15 of 26 Ch 2 Attach F 3 of 3.pdf, 69,465,777 bytes, Proprietary  
018 SUNSI Enc 2 SAR Rev 2 16 of 26 Ch 2 Attach G.pdf, 32,541,176 bytes, Proprietary  
019 SUNSI Enc 2 SAR Rev 2 17 of 26 Ch 2 Attach H.pdf, 11,256,567 bytes, Proprietary  
020 SUNSI Enc 2 SAR Rev 2 18 of 26 Ch 3 to 15.pdf, 53,755,710 bytes, Proprietary  
021 SUNSI Enc 2 SAR Rev 2 19 of 26 Appendix A.pdf, 4,327,403 bytes, Proprietary  
022 SUNSI Enc 2 SAR Rev 2 20 of 26 Appendix B.pdf, 2,194,132 bytes, Proprietary  
023 SUNSI Enc 2 SAR Rev 2 21 of 26 Appendix C.pdf, 20,064,534 bytes, Proprietary  
024 SUNSI Enc 2 SAR Rev 2 22 of 26 Appendix D.pdf, 1,276,347 bytes, Proprietary  
025 SUNSI Enc 2 SAR Rev 2 23 of 26 Appendix E.pdf, 19,579,646 bytes, Proprietary  
026 SUNSI Enc 2 SAR Rev 2 24 of 26 Appendix F.pdf, 8,711,887 bytes, Proprietary  
027 SUNSI Enc 2 SAR Rev 2 25 of 26 Appendix G.pdf, 8,872,487 bytes, Proprietary  
028 SUNSI Enc 2 SAR Rev 2 26 of 26 Appendix H.pdf, 2,820,950 bytes, Proprietary  
029 PUBLIC Enc 3 ER Rev 2 01 of 09 Cover to Ch 2.pdf, 49,113,627 bytes  
030 PUBLIC Enc 3 ER Rev 2 02 of 09 Ch 3.pdf, 85,424,196 bytes  
031 PUBLIC Enc 3 ER Rev 2 03 of 09 Ch 4.pdf, 89,856,090 bytes  
032 PUBLIC Enc 3 ER Rev 2 04 of 09 Ch 5 to Ch 10.pdf, 1,183,298 bytes  
033 PUBLIC Enc 3 ER Rev 2 05 of 09 Attach 1-1 to 4-1.pdf, 91,180,300 bytes  
034 PUBLIC Enc 3 ER Rev 2 06 of 09 Appendix A 1 of 4.pdf, 64,333,431 bytes  
035 PUBLIC Enc 3 ER Rev 2 07 of 09 Appendix A 2 of 4.pdf, 91,990,331 bytes  
036 PUBLIC Enc 3 ER Rev 2 08 of 09 Appendix A 3 of 4.pdf, 89,366,003 bytes  
037 PUBLIC Enc 3 ER Rev 2 09 of 09 Appendix A 4 of 4.pdf, 67,392,227 bytes  
038 PUBLIC Enc 4 Affidavits.pdf, 6,223,511 bytes  
039 PUBLIC Enc 5 SAR Rev 2 01 of 26 Cover to Ch 1.pdf, 18,910,860 bytes  
040 PUBLIC Enc 5 SAR Rev 2 02 of 26 Ch 2 1 of 2.pdf, 70,405,608 bytes  
041 PUBLIC Enc 5 SAR Rev 2 03 of 26 Ch 2 2 of 2.pdf, 68,559,100 bytes  
042 PUBLIC Enc 5 SAR Rev 2 04 of 26 Ch 2 Attach A.pdf, 12,298,490 bytes  
043 PUBLIC Enc 5 SAR Rev 2 05 of 26 Ch 2 Attach B 1 of 5.pdf, 68,243,817 bytes  
044 PUBLIC Enc 5 SAR Rev 2 06 of 26 Ch 2 Attach B 2 of 5.pdf, 70,432,499 bytes  
045 PUBLIC Enc 5 SAR Rev 2 07 of 26 Ch 2 Attach B 3 of 5.pdf, 62,853,598 bytes  
046 PUBLIC Enc 5 SAR Rev 2 08 of 26 Ch 2 Attach B 4 of 5.pdf, 73,101,207 bytes  
047 PUBLIC Enc 5 SAR Rev 2 09 of 26 Ch 2 Attach B 5 of 5.pdf, 72,352,798 bytes  
048 PUBLIC Enc 5 SAR Rev 2 10 of 26 Ch 2 Attach C.pdf, 9,828,770 bytes  
049 PUBLIC Enc 5 SAR Rev 2 11 of 26 Ch 2 Attach D.pdf, 66,925 bytes  
050 PUBLIC Enc 5 SAR Rev 2 12 of 26 Ch 2 Attach E.pdf, 28,090,652 bytes  
051 PUBLIC Enc 5 SAR Rev 2 13 of 26 Ch 2 Attach F 1 of 3.pdf, 68,394,949 bytes  
052 PUBLIC Enc 5 SAR Rev 2 14 of 26 Ch 2 Attach F 2 of 3.pdf, 61,949,475 bytes

053 PUBLIC Enc 5 SAR Rev 2 15 of 26 Ch 2 Attach F 3 of 3.pdf, 69,465,775 bytes  
054 PUBLIC Enc 5 SAR Rev 2 16 of 26 Ch 2 Attach G.pdf, 32,540,677 bytes  
055 PUBLIC Enc 5 SAR Rev 2 17 of 26 Ch 2 Attach H.pdf, 11,256,674 bytes  
056 PUBLIC Enc 5 SAR Rev 2 18 of 26 Ch 3 to 15.pdf, 38,476,761 bytes  
057 PUBLIC Enc 5 SAR Rev 2 19 of 26 Appendix A.pdf, 3,771,228 bytes  
058 PUBLIC Enc 5 SAR Rev 2 20 of 26 Appendix B.pdf, 2,236,104 bytes  
059 PUBLIC Enc 5 SAR Rev 2 21 of 26 Appendix C.pdf, 18,610,624 bytes  
060 PUBLIC Enc 5 SAR Rev 2 22 of 26 Appendix D.pdf, 1,331,057 bytes  
061 PUBLIC Enc 5 SAR Rev 2 23 of 26 Appendix E.pdf, 10,626,761 bytes  
062 PUBLIC Enc 5 SAR Rev 2 24 of 26 Appendix F.pdf, 4,214,235 bytes  
063 PUBLIC Enc 5 SAR Rev 2 25 of 26 Appendix G.pdf, 4,358,243 bytes  
064 PUBLIC Enc 5 SAR Rev 2 26 of 26 Appendix H.pdf, 2,341,508 bytes

**OSM#1 (Entire Submittal) (computer disk):**

001 PUBLIC ISP Transmittal Letter.pdf, 261,170 bytes  
002 PUBLIC Enc 1 Application for License.pdf, 15,924,428 bytes  
003 SUNSI Enc 2 SAR Rev 2 01 of 26 Cover to Ch 1.pdf, 18,911,223 bytes, Proprietary  
004 SUNSI Enc 2 SAR Rev 2 02 of 26 Ch 2 1 of 2.pdf, 70,405,589 bytes, Proprietary  
005 SUNSI Enc 2 SAR Rev 2 03 of 26 Ch 2 2 of 2.pdf, 68,559,092 bytes, Proprietary  
006 SUNSI Enc 2 SAR Rev 2 04 of 26 Ch 2 Attach A.pdf, 12,298,493 bytes, Proprietary  
007 SUNSI Enc 2 SAR Rev 2 05 of 26 Ch 2 Attach B 1 of 5.pdf, 68,243,578 bytes, Proprietary  
008 SUNSI Enc 2 SAR Rev 2 06 of 26 Ch 2 Attach B 2 of 5.pdf, 70,433,620 bytes, Proprietary  
009 SUNSI Enc 2 SAR Rev 2 07 of 26 Ch 2 Attach B 3 of 5.pdf, 62,853,295 bytes, Proprietary  
010 SUNSI Enc 2 SAR Rev 2 08 of 26 Ch 2 Attach B 4 of 5.pdf, 73,100,649 bytes, Proprietary  
011 SUNSI Enc 2 SAR Rev 2 09 of 26 Ch 2 Attach B 5 of 5.pdf, 72,352,851 bytes, Proprietary  
012 SUNSI Enc 2 SAR Rev 2 10 of 26 Ch 2 Attach C.pdf, 9,829,302 bytes, Proprietary  
013 SUNSI Enc 2 SAR Rev 2 11 of 26 Ch 2 Attach D.pdf, 71,501,245 bytes, Proprietary  
014 SUNSI Enc 2 SAR Rev 2 12 of 26 Ch 2 Attach E.pdf, 28,090,463 bytes, Proprietary  
015 SUNSI Enc 2 SAR Rev 2 13 of 26 Ch 2 Attach F 1 of 3.pdf, 68,395,130 bytes, Proprietary  
016 SUNSI Enc 2 SAR Rev 2 14 of 26 Ch 2 Attach F 2 of 3.pdf, 61,949,539 bytes, Proprietary  
017 SUNSI Enc 2 SAR Rev 2 15 of 26 Ch 2 Attach F 3 of 3.pdf, 69,465,777 bytes, Proprietary  
018 SUNSI Enc 2 SAR Rev 2 16 of 26 Ch 2 Attach G.pdf, 32,541,176 bytes, Proprietary  
019 SUNSI Enc 2 SAR Rev 2 17 of 26 Ch 2 Attach H.pdf, 11,256,567 bytes, Proprietary  
020 SUNSI Enc 2 SAR Rev 2 18 of 26 Ch 3 to 15.pdf, 53,755,710 bytes, Proprietary  
021 SUNSI Enc 2 SAR Rev 2 19 of 26 Appendix A.pdf, 4,327,403 bytes, Proprietary  
022 SUNSI Enc 2 SAR Rev 2 20 of 26 Appendix B.pdf, 2,194,132 bytes, Proprietary  
023 SUNSI Enc 2 SAR Rev 2 21 of 26 Appendix C.pdf, 20,064,534 bytes, Proprietary  
024 SUNSI Enc 2 SAR Rev 2 22 of 26 Appendix D.pdf, 1,276,347 bytes, Proprietary  
025 SUNSI Enc 2 SAR Rev 2 23 of 26 Appendix E.pdf, 19,579,646 bytes, Proprietary  
026 SUNSI Enc 2 SAR Rev 2 24 of 26 Appendix F.pdf, 8,711,887 bytes, Proprietary  
027 SUNSI Enc 2 SAR Rev 2 25 of 26 Appendix G.pdf, 8,872,487 bytes, Proprietary  
028 SUNSI Enc 2 SAR Rev 2 26 of 26 Appendix H.pdf, 2,820,950 bytes, Proprietary  
029 PUBLIC Enc 3 ER Rev 2 01 of 09 Cover to Ch 2.pdf, 49,113,627 bytes  
030 PUBLIC Enc 3 ER Rev 2 02 of 09 Ch 3.pdf, 85,424,196 bytes  
031 PUBLIC Enc 3 ER Rev 2 03 of 09 Ch 4.pdf, 89,856,090 bytes  
032 PUBLIC Enc 3 ER Rev 2 04 of 09 Ch 5 to Ch 10.pdf, 1,183,298 bytes  
033 PUBLIC Enc 3 ER Rev 2 05 of 09 Attach 1-1 to 4-1.pdf, 91,180,300 bytes  
034 PUBLIC Enc 3 ER Rev 2 06 of 09 Appendix A 1 of 4.pdf, 64,333,431 bytes  
035 PUBLIC Enc 3 ER Rev 2 07 of 09 Appendix A 2 of 4.pdf, 91,990,331 bytes  
036 PUBLIC Enc 3 ER Rev 2 08 of 09 Appendix A 3 of 4.pdf, 89,366,003 bytes  
037 PUBLIC Enc 3 ER Rev 2 09 of 09 Appendix A 4 of 4.pdf, 67,392,227 bytes  
038 PUBLIC Enc 4 Affidavits.pdf, 6,223,511 bytes  
039 PUBLIC Enc 5 SAR Rev 2 01 of 26 Cover to Ch 1.pdf, 18,910,860 bytes

040 PUBLIC Enc 5 SAR Rev 2 02 of 26 Ch 2 1 of 2.pdf, 70,405,608 bytes  
041 PUBLIC Enc 5 SAR Rev 2 03 of 26 Ch 2 2 of 2.pdf, 68,559,100 bytes  
042 PUBLIC Enc 5 SAR Rev 2 04 of 26 Ch 2 Attach A.pdf, 12,298,490 bytes  
043 PUBLIC Enc 5 SAR Rev 2 05 of 26 Ch 2 Attach B 1 of 5.pdf, 68,243,817 bytes  
044 PUBLIC Enc 5 SAR Rev 2 06 of 26 Ch 2 Attach B 2 of 5.pdf, 70,432,499 bytes  
045 PUBLIC Enc 5 SAR Rev 2 07 of 26 Ch 2 Attach B 3 of 5.pdf, 62,853,598 bytes  
046 PUBLIC Enc 5 SAR Rev 2 08 of 26 Ch 2 Attach B 4 of 5.pdf, 73,101,207 bytes  
047 PUBLIC Enc 5 SAR Rev 2 09 of 26 Ch 2 Attach B 5 of 5.pdf, 72,352,798 bytes  
048 PUBLIC Enc 5 SAR Rev 2 10 of 26 Ch 2 Attach C.pdf, 9,828,770 bytes  
049 PUBLIC Enc 5 SAR Rev 2 11 of 26 Ch 2 Attach D.pdf, 66,925 bytes  
050 PUBLIC Enc 5 SAR Rev 2 12 of 26 Ch 2 Attach E.pdf, 28,090,652 bytes  
051 PUBLIC Enc 5 SAR Rev 2 13 of 26 Ch 2 Attach F 1 of 3.pdf, 68,394,949 bytes  
052 PUBLIC Enc 5 SAR Rev 2 14 of 26 Ch 2 Attach F 2 of 3.pdf, 61,949,475 bytes  
053 PUBLIC Enc 5 SAR Rev 2 15 of 26 Ch 2 Attach F 3 of 3.pdf, 69,465,775 bytes  
054 PUBLIC Enc 5 SAR Rev 2 16 of 26 Ch 2 Attach G.pdf, 32,540,677 bytes  
055 PUBLIC Enc 5 SAR Rev 2 17 of 26 Ch 2 Attach H.pdf, 11,256,674 bytes  
056 PUBLIC Enc 5 SAR Rev 2 18 of 26 Ch 3 to 15.pdf, 38,476,761 bytes  
057 PUBLIC Enc 5 SAR Rev 2 19 of 26 Appendix A.pdf, 3,771,228 bytes  
058 PUBLIC Enc 5 SAR Rev 2 20 of 26 Appendix B.pdf, 2,236,104 bytes  
059 PUBLIC Enc 5 SAR Rev 2 21 of 26 Appendix C.pdf, 18,610,624 bytes  
060 PUBLIC Enc 5 SAR Rev 2 22 of 26 Appendix D.pdf, 1,331,057 bytes  
061 PUBLIC Enc 5 SAR Rev 2 23 of 26 Appendix E.pdf, 10,626,761 bytes  
062 PUBLIC Enc 5 SAR Rev 2 24 of 26 Appendix F.pdf, 4,214,235 bytes  
063 PUBLIC Enc 5 SAR Rev 2 25 of 26 Appendix G.pdf, 4,358,243 bytes  
064 PUBLIC Enc 5 SAR Rev 2 26 of 26 Appendix H.pdf, 2,341,508 bytes

**OSM#2 (Pubic Portions) (computer disk):**

001 PUBLIC ISP Transmittal Letter.pdf, 261,170 bytes  
002 PUBLIC Enc 1 Application for License.pdf, 15,924,428 bytes  
029 PUBLIC Enc 3 ER Rev 2 01 of 09 Cover to Ch 2.pdf, 49,113,627 bytes  
030 PUBLIC Enc 3 ER Rev 2 02 of 09 Ch 3.pdf, 85,424,196 bytes  
031 PUBLIC Enc 3 ER Rev 2 03 of 09 Ch 4.pdf, 89,856,090 bytes  
032 PUBLIC Enc 3 ER Rev 2 04 of 09 Ch 5 to Ch 10.pdf, 1,183,298 bytes  
033 PUBLIC Enc 3 ER Rev 2 05 of 09 Attach 1-1 to 4-1.pdf, 91,180,300 bytes  
034 PUBLIC Enc 3 ER Rev 2 06 of 09 Appendix A 1 of 4.pdf, 64,333,431 bytes  
035 PUBLIC Enc 3 ER Rev 2 07 of 09 Appendix A 2 of 4.pdf, 91,990,331 bytes  
036 PUBLIC Enc 3 ER Rev 2 08 of 09 Appendix A 3 of 4.pdf, 89,366,003 bytes  
037 PUBLIC Enc 3 ER Rev 2 09 of 09 Appendix A 4 of 4.pdf, 67,392,227 bytes  
038 PUBLIC Enc 4 Affidavits.pdf, 6,223,511 bytes  
039 PUBLIC Enc 5 SAR Rev 2 01 of 26 Cover to Ch 1.pdf, 18,910,860 bytes  
040 PUBLIC Enc 5 SAR Rev 2 02 of 26 Ch 2 1 of 2.pdf, 70,405,608 bytes  
041 PUBLIC Enc 5 SAR Rev 2 03 of 26 Ch 2 2 of 2.pdf, 68,559,100 bytes  
042 PUBLIC Enc 5 SAR Rev 2 04 of 26 Ch 2 Attach A.pdf, 12,298,490 bytes  
043 PUBLIC Enc 5 SAR Rev 2 05 of 26 Ch 2 Attach B 1 of 5.pdf, 68,243,817 bytes  
044 PUBLIC Enc 5 SAR Rev 2 06 of 26 Ch 2 Attach B 2 of 5.pdf, 70,432,499 bytes  
045 PUBLIC Enc 5 SAR Rev 2 07 of 26 Ch 2 Attach B 3 of 5.pdf, 62,853,598 bytes  
046 PUBLIC Enc 5 SAR Rev 2 08 of 26 Ch 2 Attach B 4 of 5.pdf, 73,101,207 bytes  
047 PUBLIC Enc 5 SAR Rev 2 09 of 26 Ch 2 Attach B 5 of 5.pdf, 72,352,798 bytes  
048 PUBLIC Enc 5 SAR Rev 2 10 of 26 Ch 2 Attach C.pdf, 9,828,770 bytes  
049 PUBLIC Enc 5 SAR Rev 2 11 of 26 Ch 2 Attach D.pdf, 66,925 bytes  
050 PUBLIC Enc 5 SAR Rev 2 12 of 26 Ch 2 Attach E.pdf, 28,090,652 bytes  
051 PUBLIC Enc 5 SAR Rev 2 13 of 26 Ch 2 Attach F 1 of 3.pdf, 68,394,949 bytes  
052 PUBLIC Enc 5 SAR Rev 2 14 of 26 Ch 2 Attach F 2 of 3.pdf, 61,949,475 bytes  
053 PUBLIC Enc 5 SAR Rev 2 15 of 26 Ch 2 Attach F 3 of 3.pdf, 69,465,775 bytes



054 PUBLIC Enc 5 SAR Rev 2 16 of 26 Ch 2 Attach G.pdf, 32,540,677 bytes  
055 PUBLIC Enc 5 SAR Rev 2 17 of 26 Ch 2 Attach H.pdf, 11,256,674 bytes  
056 PUBLIC Enc 5 SAR Rev 2 18 of 26 Ch 3 to 15.pdf, 38,476,761 bytes  
057 PUBLIC Enc 5 SAR Rev 2 19 of 26 Appendix A.pdf, 3,771,228 bytes  
058 PUBLIC Enc 5 SAR Rev 2 20 of 26 Appendix B.pdf, 2,236,104 bytes  
059 PUBLIC Enc 5 SAR Rev 2 21 of 26 Appendix C.pdf, 18,610,624 bytes  
060 PUBLIC Enc 5 SAR Rev 2 22 of 26 Appendix D.pdf, 1,331,057 bytes  
061 PUBLIC Enc 5 SAR Rev 2 23 of 26 Appendix E.pdf, 10,626,761 bytes  
062 PUBLIC Enc 5 SAR Rev 2 24 of 26 Appendix F.pdf, 4,214,235 bytes  
063 PUBLIC Enc 5 SAR Rev 2 25 of 26 Appendix G.pdf, 4,358,243 bytes  
064 PUBLIC Enc 5 SAR Rev 2 26 of 26 Appendix H.pdf, 2,341,508 bytes