

**INTERIM STORAGE
PARTNERS**

72-1050

March 12, 2019
E-53819

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: Submission of ISP Draft Responses for RAIs NP-2.2-1, NP-2.2-2 and EP-X and Associated Document Markups for March 20, 2019 Meeting

Reference: 1. Letter from John-Chau Nguyen (NRC) to Jeffery D. Isakson, "Interim Storage Partners' License Application to Construct and Operate the Waste Control Specialists Consolidated Interim Storage Facility, Andrews County, Tx, Docket 72-1050 – First Request for Additional Information, Part 1," dated November 16, 2018

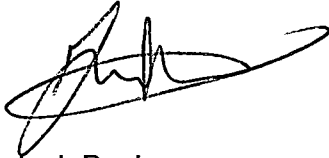
Interim Storage Partners LLC hereby submits its draft RAI responses for the meeting scheduled for March 20, 2019 to discuss RAIs NP-2.2-1 and NP-2.2-2 and all of the RAIs related to the Consolidated Emergency Response Plan.

The proprietary RAI responses are provided in Enclosures 2 through 4. The draft Consolidated Emergency Response Plan incorporating the changes described in the RAI responses is provided in Enclosure 5. Enclosure 6 includes the proprietary report which forms the basis for the response to RAI NP-2.2-1 and the proprietary calculation that supports the response to RAP NP-2.2-2. Affidavits (Enclosure 1) are provided for the proprietary information. Enclosure 7 provides the non-proprietary versions of the all of the RAI responses. The Enclosure 6 documents are entirely proprietary and no non-proprietary versions are included.

Should you have any questions regarding this submission, please contact me by telephone at (410) 910-6955, or by email at jack.boshoven@orano.group.

NM5520
NM5526

Sincerely,



Jack Boshoven
Chief Engineer CISF, Licensing and Engineering
Interim Storage Partners LLC

cc: John-Chau Nguyen, Senior Project Manager, U.S. NRC
Richard Turtill, U.S. NRC
Jeff Isakson, ISP LLC
Elicia Sanchez, ISP LLC
Renee Murdock, ISP LLC

Enclosures:

1. Affidavits Pursuant to 10 CFR 2.390
 - a. Waste Control Specialists
 - b. Interim Storage Partners
2. Draft Response to RAI NP-2.2-1 with SAR Markups (Proprietary Version)
3. Draft Response to RAI NP-2.2-2 with SAR Markups (Proprietary Version)
4. Draft Responses to RAI EP-X (Proprietary Version)
5. Draft Consolidated Emergency Plan Revision 2.08.2019
6. Calculations (Proprietary)
 - a. Aircraft Hazard Evaluation Report Revision 0
 - b. WCS01-0211 Revision 0
7. Draft RAI Responses to RAIs NP-2.2-1, NP-2.2-2 and EP-X (Non-Proprietary Version)

Enclosure 1

Affidavits Pursuant to 10 CFR 2.390

WASTE CONTROL SPECIALISTS LLC

AFFIDAVIT

I, Elicia Sanchez, Senior Vice President of Key Initiatives and Communication at Waste Control Specialists LLC (WCS), am making the following representations that to the best of my knowledge and beliefs:

1. The following document which WCS wishes to have withheld from public disclosure is:
 - a) **Emergency Information List which is part of the RAI EP-8 response.**
 - b) **Marked SAR sections associated with RAIs NP-2.2-1 and NP-2.2-2 responses.**
2. The information contained in the document cited in 1 above is considered confidential information pursuant to Title 10 of the Code of Federal Regulations (CFR), Part 2.390(a)(4) and is thereby protected from public disclosure by regulation.
3. Pursuant to 10 CFR 2.390, the information contained in the document cited in 1 above is protected from public disclosure by regulation because it includes correspondences and reports to the NRC which contain trade secrets or commercial information pursuant to 10 CFR 2.390(a)(4).
4. The information contained in the document cited in 1 above has not been made available to public sources by WCS, nor has WCS authorized that it be made available.

Elicia Sanchez 3-12-19
Elicia Sanchez Date
Senior VP of Key Initiatives and Communication

I certify the above named person appeared before me and executed this document on this the 12 day of March, 2019

Renee Hopson
Notary Public

My commission expires: 6-21-2020

