

INTERIM STORAGE PARTNERS

April 1, 2019
E-53940

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

72-1050

Subject: Submission of ISP Draft Responses for RAIs NP-2.4-x, NP-2.6-x, and P-2.6-x and Associated Document Markups for the April 11, 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
 2. Letter from John-Chau Nguyen (NRC) to Jeffery D. Isakson, "Interim Storage Partners LLC's License Application to Construct and Operate the Waste Control Specialists Consolidated Interim Storage Facility, Andrews County, Texas, Docket 72-1050 – First Request for Additional Information, Part 2," dated March 6, 2019

Interim Storage Partners LLC hereby submits its draft RAI responses for the meeting scheduled for April 11, 2019 to discuss RAIs NP-2.4-x, NP-2.6-x, and P-2.6-x.

RAI's NP-2.6-3, NP-2.6-4, NP-2.6-5, P-2.6-3, P-2.6-5 and P-2.6-6 are all related to settlement questions for the storage pads. While not all of these RAI's specifically address settlement in the question, the questions are related to investigation depth, material property selection, and analysis depth which all are inputs within the settlement calculations. As we discussed at our February 19th meeting, we are working with two suppliers to revise the settlement calculations to include the items outlined in the aforementioned RAI's. In addition, several RAIs included in Reference 2 are also related to the storage pads and will most likely require updates to the same calculations to fully respond to the related RAIs. Rather than make two updates to the storage pad calculations, ISP plans to respond to all of these related RAIs at the same time.

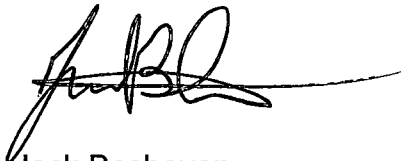
NM5520
NM5526

Upon conclusion of the revised settlement analysis, the Report of Geotechnical Exploration will be revised to accommodate the changes as well as the settlement calculations provided in Chapter 7 of the SAR. These revised documents as well as the individual response to the RAI's for both Part 1 and Part 2 will be submitted at that time.

Enclosure 2 to this letter provides the draft responses to the Non-Proprietary RAIs NP-2.4-x along with related SAR changes. Enclosure 3 provides the draft responses to the Non-Proprietary RAIs NP-2.6-x, except RAIs NP-2.6-3, NP-2.6-4 and NP-2.6-5 as discussed above. Enclosure 4 (Proprietary) provides responses to Proprietary RAIs P-2.6-x, except RAIs P-2.6-3, P-2.6-5 and P-2.6-6 as discussed above. An affidavit (Enclosure 1) is provided for the proprietary RAI responses. Finally, Enclosure 5 provides the updated drainage and floodplain analysis less the Appendices A through E which do not include any changes from the previous revision submitted with Revision 2 of the SAR. The drainage and floodplain analysis are Attachment B to Chapter 2 of the SAR.

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.

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. Interim Storage Partners
2. Draft Response to RAI NP-2.4-x with SAR Markups
3. Draft Response to RAI NP-2.6-x with SAR Markups
4. Draft Responses to RAI P-2.6-x (Proprietary)
5. Attachment B to SAR Chapter 2 (Partial) associated with Response to RAI NP-2.4-1

Enclosure 1

Affidavits Pursuant to 10 CFR 2.390

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

ISP LLC)
State of Maryland) SS.
County of Howard)

I, Jeffery Isakson, depose and say that I am Chief Executive Officer/President, Interim Storage Partners LLC duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information that is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought applies to the following documents listed below:

- Enclosure 4 of E-53940 Responses to Proprietary RAIs P-2.6-x

These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Interim Storage Partners LLC in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

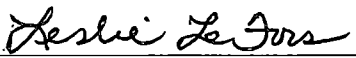
- 1) The information sought to be withheld from public disclosure involves information related to the design of the WCS CISF, which are owned and have been held in confidence by Interim Storage Partners LLC.
- 2) The information is of a type customarily held in confidence by Interim Storage Partners LLC, and not customarily disclosed to the public. Interim Storage Partners LLC has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of Interim Storage Partners LLC, because the information consists of descriptions of the design and analysis of the WCS CISF, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Interim Storage Partners LLC, take marketing or other actions to improve their product's position or impair the position of Interim Storage Partners LLC product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.



Jeffery Isakson
Chief Executive Officer/President, Interim Storage Partners LLC

Subscribed and sworn before me this 11th day of March, 2019.


Notary Public

My Commission Expires 9/29/21

