



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 19, 2019

MEMORANDUM TO: Christopher M. Regan, Deputy Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: John-Chau Nguyen, Senior Project Manager
Spent Fuel Licensing Branch /RA John McKirgan Acting for/
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF MARCH 20, 2019, PUBLIC MEETING TO DISCUSS
REQUEST FOR ADDITIONAL INFORMATION ISSUED IN
CONNECTION WITH NRC'S REVIEW OF THE INTERIM STORAGE
PARTNERS CONSOLIDATED INTERIM STORAGE FACILITY
APPLICATION FOR A FACILITY AT ANDREWS COUNTY, TEXAS

PURPOSE:

For the U.S. Nuclear Regulatory Commission (NRC) staff and representatives from Interim Storage Partners (ISP) to discuss NRC's request for additional information (RAI) dated November 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18320A184), issued in connection with its review of the license application (previously submitted by Waste Control Specialists) for the proposed ISP Consolidated Interim Storage Facility (CISF). The meeting was noticed on March 7, 2019 (ADAMS Accession No. ML19066A273).

MEETING SUMMARY

On March 20, 2019, NRC staff held a Category 1 public meeting with representatives from ISP at NRC's headquarters in Rockville, Maryland. Attendees included ISP and its contractors, NRC staff, and members of the public. The discussion followed the agenda provided in Enclosure 1. NRC and ISP staff and contractors discussed the draft RAI responses, which were submitted to the NRC on March 12, 2019, and can be found in ADAMS at Accession No. ML19073A272. Members of the public were given an opportunity to ask questions pertaining to the draft RAI responses following discussions between NRC and ISP. The list of meeting attendees is provided in Enclosure 2.

CONTACT: John-Chau Nguyen, NMSS/DSFM
(301) 415-0262

Following introductions and opening remarks, representatives from ISP discussed with NRC staff about its safety analysis associated with aircraft crash probability and impacts analysis.

RAI 2.2-1 requested an evaluation and aircraft crash probability impact analysis. ISP indicated that it had performed an aircraft hazards evaluation for the WCS CISF and added a summary of that evaluation in new SAR Section 2.2.1, "Aircraft Hazard Evaluation." NRC staff inquired as to how the area for crash evaluation was determined. Following discussion between NRC staff and ISP, NRC staff emphasized that the applicant should seek to follow NRC guidance as it relates to this analysis.

RAI 2.2-2 requested the locations of nearby industrial, transportation, military, and nuclear installations, and to describe potential hazards to the proposed WCS CISF from activities or materials at those facilities. NRC staff noted that the applicant had evaluated the hazards associated with such facilities and installations, but observed that results and other details of the analyses were presented inconsistently within the response to the RAI and hence, the SAR. NRC staff encouraged the applicant be more consistent with regard to these and other sections of the SAR relative to accident and hazard analyses and scenarios.

RAI EP-4 requested clarification of statements in SAR Section 3.1, "Classifications of Accidents," of the proposed consolidated emergency response plan (CERP), which refer to classification of accidents at the proposed CISF for both an Alert and Site Area Emergency declarations; and RAI EP-19 sought justification as to why the most recent version of the NRC endorsed methodology for the development of emergency action levels (EALs) was not used in the development of the EALs for the WCS CERP specific to the CISF. ISP indicated that it had revised Section 3.1 of the draft CERP to clarify which classifications of accidents are specific to each facility (the existing Waste Control Specialists SP&D facilities or WCS CISF). ISP also indicated that newly added Appendix D of the CERP "WCS CISF Facility Emergency Action Levels" had been incorporated, using as guidance NEI 99-01 "Development of Emergency Action Levels for Non Passive Reactors," Revision 6, dated November 2012 to develop EALs applicable to the WCS CISF.

NRC staff indicated that there were some discrepancies among the tables in the SAR regarding emergency action levels, and that those discrepancies were to be addressed, or modifications made to the EALs and EAL classifications. Finally, staff noted that there existed inconsistencies with regard to "unusual events" vs. "alerts" and that these inconsistencies in the CERP were to be further addressed by the applicant.

RAI EP-6 sought clarification about responsible individuals (designated emergency response organization (ERO) position) on site at all times (24-hour per day, 7 days per week) with the authority and responsibility to accurately and timely perform emergency classification, and notify offsite agencies and the NRC. The applicant indicated that it had revised the CERP to address this issue. NRC staff and ISP also discussed the need to articulate in the CERP, timely emergency communications, and the issue of prompt notification and incident response coordination, and identification of personnel performing those functions.

RAI EP-13 sought to have the applicant revise the threshold limits in Section 5.5, "Exposure Control," and Table B, "Protective Action Guidance," of the proposed CERP to ensure consistency with the latest version of the U.S. Environmental Protection Agency (EPA) Protective Action Guide (PAG) Manual for early phase PAGs. NRC staff reiterated the need for consistency for all dry cask storage emergency preparedness plans and activities.

ISP indicated that it had revised the table in CERP Section 5.5 and designated the table as Table C to ensure consistency with the latest version of the U.S. EPAPAG Manual for early phase PAGs. ISP indicated that the recommended actions listed in Table C are now consistent with the PAG but are worded slightly different to more closely match the WCS facilities.

The meeting adjourned at 1:15 p.m. The public asked no questions following the business portion of the meeting. No regulatory decisions were made at the meeting.

Docket No.: 72-1050

CAC/EPID No.: 001028/L-2017-NEW-0002

Enclosures:

1. Meeting Agenda
2. Attendance list

SUBJECT: SUMMARY OF MARCH 20, 2019, PUBLIC MEETING TO DISCUSS REQUEST FOR ADDITIONAL INFORMATION ISSUED IN CONNECTION WITH NRC'S REVIEW OF THE INTERIM STORAGE PARTNERS CONSOLIDATED INTERIM STORAGE FACILITY APPLICATION FOR A FACILITY AT ANDREWS COUNTY, TEXAS, DOCUMENT DATE: April 19, 2019

DISTRIBUTION:

DSFM r/f
NRC Attendees

Filename: G:\SFST\Nguyen\Casework\WCS\03202019 Public Meeting to discuss RAIs/Final for Publication MTNG SUMMARY 03202019.docx

Memo: ML19105B217 ISP Meeting Information: ML19073A272

C=Without attachment/enclosure E=With attachment/enclosure N=No copy

OFFICE:	SFM		SFM		SFM		SFM	
NAME:	RTurtill		JNguyen		WWheatley		JMcKirgan	
DATE:	4/12/2019		4/15/2019		4/15/2019		4/19/2019	

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AGENDA

Public Meeting between Interim Storage Partners, LLC (ISP), and the Nuclear Regulatory Commission (NRC)

March 20, 2019

12:30 p.m. – 3:30 p.m. (Eastern Standard Time)

Room: 3WFN-8A28

Purpose: To discuss NRC's request for additional information, dated November 16, 2018, issued in connection with NRC's review of the license application for the proposed ISP Consolidated Interim Storage Facility at Andrews County, TX.

12:30 p.m. – 12:35 p.m.	Introductions / Opening Remarks	NRC/ISP
12:35 p.m. – 12:55 p.m.	Discussion of Site Characteristic-related request for additional information (RAIs) 2.2-1 and 2.2-2	ISP/NRC
12:55 p.m. – 3:15 p.m.	Discussion of Emergency Response Plan-related RAIs EP-1 through EP-20	ISP/NRC
3:15 p.m. – 3:30 p.m.	Opportunity for Public Questions and Comments for NRC staff	NRC/Public
3:30 p.m.	Adjourn	

MEETING ATTENDEES

Participants: ISP and the Nuclear Regulatory Commission
Date: March 20, 2019, 12:30 P.M. – 3:30 P.M.
Location: Three White Flint North, Room 1C03

NAME	AFFILIATION
Ilka Berrios	NRC
John-Chau Nguyen	NRC
Michael Norris	NRC
Richard Turtill	NRC
Seshagiri Tammara	NRC
Joseph Anderson	NRC
Richard Turtill	NRC
Alana Wase	NRC
Kara McCullough	NRC
Jeff Isakson	ISP
Elicia Sanchez	ISP
Jack Boshoven	ISP
Timothy Matthews	Morgan Lewis
Stephen Burdick	Morgan Lewis
Earl Easton	ISP
Renee Murdock / call-in	ISP
Ben Mason	ISP
Annette Haynes / call-in	ISP
Jay Cartwright	ISP
Jay Britten	ISP

NAME	AFFILIATION
Paul Romo / call-in	ISP
Wren Fowler / call-in	NAC
Jenny Caldwell / call-in	ISP
Donna Gilmore / call-in	Public
Carlyn Greene / call-in	UxC
Veena Gubbi/call in	New Jersey State Government
Michael Keegan/call in	Public/Don't Waste Michigan
Diane D'Arrigo/call in	Nuclear Information and Resource Service
Lane Howard / call-in	SWRI
Anthony Leshinskie /call in	State of Vermont
Laura Schwartz/call in	Intl. Technology and Trade Association