



INTERIM STORAGE PARTNERS

May 31, 2019
E-54257

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 Partial Response to First RAI, Part 1, Docket 72-1050
CAC/EPID 001028/L-2017-NEW-0002

- 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, Texas, 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 (ISP) hereby submits a partial response to the First Request for Additional Information, Part 1 issued November 16, 2018 (Reference 1) to support the continued review of the WCS CISF License Application. Contained in this submittal are the responses, including revised safety analysis report (SAR) pages, revised draft Emergency Response Plan (ERP), and other supporting documents, for 39 of the 52 RAIs included in Reference 1.

RAIs 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 RAIs specifically address settlement, the questions are related to investigation depth, material property selection, and analysis depth which all are inputs to the settlement calculations. Several RAIs included in Reference 2 are also related to the storage pads

and will require updates to the same calculations to fully respond to the 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.

The remaining seven RAIs (RAI NP-2.4-2, NP-2.6-1, NP-2.6-2, NP-2.6-6, P-2.6-1, P-2.6-2 and P-2.6-4) are in the process of being revised based on our April 11, 2019 meeting with the NRC discussing our draft responses to those RAIs. We expect to submit these seven RAI responses within the next month.

The following enclosures are being submitted:

- Enclosure 1 included affidavits pursuant to 10 CFR 2.390 from Interim Storage Partners, Waste Control Specialists, NAC International, and TN Americas.
- Enclosure 2, herein, provides a proprietary version of the response to the RAIs.
- Enclosure 3 provides a public version of these responses. Each RAI response has a section stating the impact of the response on the SAR or ERP indicating which sections, tables, etc., have been changed.
- Enclosure 4 provides a description of additional changes that are not associated with the RAIs.
- Enclosure 5 provides the proprietary version of the SAR changed pages associated with the RAI responses.
- Enclosure 6 is a public version of Enclosure 5.
- Enclosure 7 is the updated draft Consolidated Emergency Response Plan.
- Enclosure 8 includes the proprietary report which forms the basis for the response to RAI NP-2.2-1; the proprietary calculation that supports the response to RAI NP-2.2-2; the proprietary calculation that supports the response to RAI NP-15-1; and the update Reference 15-3 changed as part of the response to RAI NP-15-10.
- Enclosure 9 includes the proprietary/Sensitive Unclassified Non-Safeguards Information (SUNSI) drawings in support of the response to RAI NP-15-2.
- Enclosure 10 includes the native files for the HEC-HMS Input which forms Appendix E of the flood plain analysis.

Please note that Enclosure 10 deviates from the NRC guidance on electronic submittals as described above.

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

Sincerely,



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

cc: John-Chau Nguyen, Senior Project Manager, U.S. NRC
Jack Boshoven, ISP LLC
Elicia Sanchez, ISP LLC
Renee Murdock, ISP LLC

Enclosures:

1. Affidavits Pursuant to 10 CFR 2.390
 - a. Interim Storage Partners
 - b. Waste Control Specialists
 - c. NAC International
 - d. TN Americas
2. RAI Responses (Proprietary Version)
3. RAI Responses (Public Version)
4. Additional Changes Not Associated with the RAIs (Public)
5. SAR Changed Pages (Proprietary and Security-Related Version)
6. SAR Changed Pages (Public Version)
7. Updated Draft Consolidated Emergency Response Plan (Public)
8. Calculations (Proprietary)
 - a. Aircraft Hazard Evaluation Report Revision 0
 - b. WCS01-0200 Revision 0
 - c. WCS01-0211 Revision 0
 - d. SCE-01-0110-01 Revision 1
 - e. 71160-2101 Revision 9
9. Drawings (Proprietary)
 - a. 11221-1000 Revision 1
 - b. 11221-1002 Revision 0
10. Appendix E to Flood Plain Analysis – HEC-HMS Input (Proprietary) (contained on one DVD)

Document Components:

001 PUBLIC ISP Transmittal Letter.pdf, 686,501 bytes
002 PUBLIC Encl 1 Affidavits.pdf, 3,776,744 bytes
003 SUNSI Encl 2 RAI responses proprietary version.pdf, 1,231,735 bytes, Proprietary 004
004 PUBLIC Encl 3 RAI responses public version.pdf, 1,185,586 bytes
005 PUBLIC Encl 4 List of non RAI Changes.pdf, 492,510 bytes
006 SUNSI Encl 5 SAR Changed Pages.pdf, 5,688,100 bytes, Proprietary
007 PUBLIC Encl 6 SAR Changed Pages.pdf, 6,252,980 bytes
008 PUBLIC Encl 7 Updated Draft Consolidated Emergency Plan.pdf, 27,754,572 bytes
009 SUNSI Encl 8 Calculations.pdf, 81,662,186 bytes, Proprietary
010 SUNSI Encl 9 Drawings.pdf, 974,809 bytes, Proprietary
011 SUNSI Encl 10 HEC-HMS Input (folder), 56,723,544 bytes, Proprietary

OSM#1 (Entire Submittal):

001 PUBLIC ISP Transmittal Letter.pdf, 686,501 bytes
002 PUBLIC Encl 1 Affidavits.pdf, 3,776,744 bytes
003 SUNSI Encl 2 RAI responses proprietary version.pdf, 1,231,735 bytes, Proprietary 004
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010 SUNSI Encl 9 Drawings.pdf, 974,809 bytes, Proprietary

OSM#2 (Public Information Only):

001 PUBLIC ISP Transmittal Letter.pdf, 686,501 bytes
002 PUBLIC Encl 1 Affidavits.pdf, 3,776,744 bytes
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