

**INTERIM STORAGE
PARTNERS**

June 26, 2019
E-54576

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: Partial Response to RAI Part 1, Physical Security, including Revision 3 of the Physical Security Plan, Guard Training and Qualification Plan, Docket 72-1050

- Reference:**
1. Letter from John-Chau Nguyen (NRC) to Elicia Sanchez (ISP), Interim Storage Partners' License Application to Construct and Operate the Waste Control Specialists Consolidated Interim Storage Facility, Andrews County, Texas, Docket No. 72-1050 – First Request for Additional Information Part 1, Physical Security, dated November 6, 2018 (E-51587)
 2. Letter from Elicia B. Sanchez (ISP) to Document Control Desk (NRC), Partial Response to RAI Part 1, Physical Security, including Revision 3 of the Physical Security Plan, Guard Training and Qualification Plan, Docket 72-1050, dated January 7, 2019
 3. Letter from Elicia B. Sanchez (ISP) to Document Control Desk (NRC), Partial Response to RAI Part 1, Physical Security, including Revision 3 of the Physical Security Plan, Guard Training and Qualification Plan, Docket 72-1050, E-53893, dated March 22, 2019
 4. Letter from Jack Boshoven (ISP) to Document Control Desk (NRC), Interim Storage Partners (ISP) First Request for Additional Information *RAI) Proposed Submittal Schedule, Docket 72-1050, E-54395, dated May 31, 2019

~~Safeguards Information~~

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Interim Storage Partners LLC (ISP) hereby submits its draft RAI responses for Physical Security RAIs RAI-9, -10, -11, -12, -13, -14, -16, -19, -22, -23, and -26 and a new 2019 WCS CISF Blast Analysis supporting these responses. ISP requests that a meeting be scheduled to discuss this submittal with NRC Staff in accordance with ISP's reference 4 letter.

In addition ISP also submits revised or supplemented draft responses to Physical Security RAIs RAI-6 and -8 also to be discussed in the aforementioned requested meeting.

Interim Storage Partners provided a partial response to the Request for Additional Information (RAI) Part 1, Physical Security documented in the attachments to the NRC letter dated November 6, 2018 (Reference 1) on January 7, 2019 (Reference 2). The reference 2 submittal provided responses to seventeen (17) of the twenty-eight (28) RAIs attached to Reference 1. On March 22, 2019 ISP (Reference 3) provided draft responses to the remaining eleven (11) RAIs along with topics of discussion/clarification associated with some of the RAIs. The revisions to the various documents (PSP, TQP, etc.) discussed in the Draft RAI responses were not completed at that time were not provided to the PSP, TQP and SCP with that submittal. NRC and ISP met on April 4, 2019 to discuss the draft responses and topics identified in our draft responses.

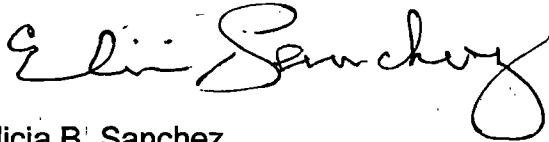
This submittal incorporates the items discussed during the April 4, 2019 meeting. Per our discussions during the meeting, ISP is including Revision 4(Draft) of the PSP, TQP and SCP. Also discussed in the April 4, 2019 meeting was the 2015 blast analysis and ISP is evaluating superseding or revising this analysis to address verbal comments and will submit the result to the NRC with the final responses to the Physical Security RAIs.

Enclosures 1 through 5 are marked as Safeguards Information and must be withheld from unauthorized disclosure pursuant to 10 CFR 73.22. Enclosure 6 contains a full size PDF copy of attachment 10.1 and 10.2 of the PSP and is not designated as SGI when separated from the PSP.

ISP requests that a copy of all correspondence regarding this matter be directly mailed to Mr. Jack Boshoven, Chief Engineer CISF Licensing and Engineering, at 7135 Minstrel Way, Suite 300, Columbia, MD 21045.

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

Sincerely,



Elicia B. Sanchez,
Chief Financial Officer
Interim Storage Partners LLC

cc: John (Chau) Nguyen (NRC SFM) – Letter Only
Jeff Isakson, ISP/TN Americas – Letter Only
Jack Boshoven, ISP/TN Americas – Letter Only

Enclosures:

1. Draft RAI Responses dated June 26, 2019 (SGI)
2. Consolidated Interim Storage Facility Physical Security Plan, PSP-100, Revision 4 (Draft) (SGI)
3. Consolidated Interim Storage Facility Security Training and Qualification Plan, TQP-700, Revision 4 (Draft) (SGI)
4. Consolidated Interim Storage Facility Safeguards Contingency Plan, PSP-300, Revision 4 (Draft) (SGI)
5. 2019 CISF Blast Analysis, Dated June 13, 2019 (Draft) (SGI)
6. DVD with full size print of PSP Attachments 10.1 and 10.2 (Not SGI)