

## INTERIM STORAGE PARTNERS

August 30, 2019  
E-54837

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 Several RAIs and Associated Document Markups from First Request For Additional Information, Part 2, 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 LLC's 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 3," dated April 23, 2019
  2. Letter from Jack Boshoven to John-Chau Nguyen (NRC), "Interim Storage Partners (ISP) First Request for Additional Information (RAI) Proposed Submittal Schedule, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-54395, dated May 31, 2019

Interim Storage Partners LLC hereby submits its draft responses to RAIs from Reference [1] in preparation for meetings to be scheduled with NRC staff for discussion. The draft responses and associated application change pages being submitted are consistent with those identified in Table 4 of Reference [2]. Enclosure 2 (proprietary) contains the draft responses to the RAIs and associated marked up pages for the Environmental Report and Safety Analysis Report. Enclosure 3 (non-proprietary) is the non-proprietary version of Enclosure 2. Affidavits (Enclosure 1) are provided for the proprietary information.

Please note that the referenced Enclosures in the RAI responses that include reports, spreadsheets, Maps, and the Waste Control Specialists LLRW License Application are not included in this submittal, but will be included when the final responses to these

NM5520  
NM5526

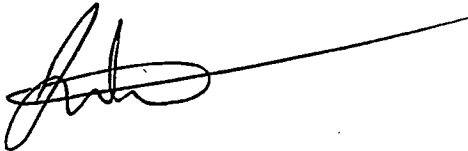
RAIs are submitted following our meetings with the NRC Staff to discuss the draft responses.

The following RAIs, which were listed in Table 4 of Reference [2] for submittal with this batch are being rescheduled for submittal at a later time as listed below.

- RAIs SOC-1, CI-1 CI-2, CB-1, CB-2, CB-3, and CB-4 will be submitted within the next month. While these RAIs are all associated with a revised Cost Benefit Analysis that is being performed in support of the WCS CISF project. ISP requires a more time provide complete and high quality responses.

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](mailto: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  
Jeff Isakson, ISP LLC  
Elicia Sanchez, ISP LLC

Enclosures:

1. Affidavits Pursuant to 10 CFR 2.390
  - a. Interim Storage Partners
2. Draft RAI Responses with associated application change pages (Proprietary)
3. Draft RAI Responses with associated application change pages (Public)

**Enclosure 1 to E-54837**

**Affidavits Pursuant to 10 CFR 2.390**

**a. Interim Storage Partners**

**AFFIDAVIT PURSUANT**  
**TO 10 CFR 2.390**

Interim Storage Partners LLC       )  
State of Maryland                    )  
County of Howard                    )       SS.

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 2 of E-54837 RAI GS-4
- Enclosure 2 of E-54837 RAI LU-2 Attachment LU-2-1
- Enclosure 2 of E-54837 RAI WR-5 Attachment WR-5-1
- Enclosure 2 of E-54837 RAI CHR-2 Environmental Report Markup Pages Attachment 3-4
- Enclosure 2 of E-54837 RAI ECO-1 Environmental Report Markup Pages Attachment 3-6
- Enclosure 2 of E-54837 RAI GS-4 Environmental Report Markup Pages Table 3.1-3
- Enclosure 2 of E-54837 RAI LU-2 Environmental Report Markup Pages Figures 3.1-5, 3.1-6, 3.1-7, and 3.1-8

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.

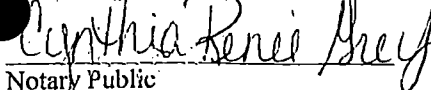
- 1) The information sought to be withheld from public disclosure involves ecological, geological, and geophysical information and data – including maps – concerning location of wells, cultural and historic resources, ecological resources, and geophysical features related to the siting of the WCS CISF, 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 ecological, geological, and geophysical resources on and adjacent to 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 or project to better compete with Interim Storage Partners LLC, take marketing or other actions to improve their product's or project's position or impair the position of Interim Storage Partners LLC product or project, and avoid developing similar data 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 30<sup>th</sup> day of August, 2019.

  
Notary Public

My Commission Expires 04/07, 2020

