

INTERIM STORAGE PARTNERS

October 8, 2019
E-55033

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 3, 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 (ISP) 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 changed pages being submitted are the remaining portion of those identified in Table 4 of Reference [2] associated with the Environmental Report (ER); the rest were submitted earlier in accordance with the timeline in the table. Enclosure 2 (proprietary) contains the draft responses to the RAIs and associated marked up pages for the ER. Enclosure 3 (public) is the non-proprietary version of Enclosure 2.

Certain portions of this submittal include proprietary information, which may not be used for any purpose other than to support the NRC staff's review of the application. In accordance with 10 CFR 2.390, ISP is providing an affidavit (Enclosure 1), specifically requesting that this proprietary information be withheld from public disclosure.

NM5520
NM5526

The following RAIs are the subject of this submittal. Please note that the ER markups included in Enclosures 2 and 3 also may contain markups supporting other RAIs addressed in an earlier submittal.

- RAIs SOC-1, CI-1 CI-2, CB-1, CB-2, CB-3, and CB-4, associated with a revised Cost Benefit Analysis performed in support of the WCS CISF project

Should you have any questions regarding this submission, please contact me by telephone at (410) 910-6897, or by email at christopher.olsen@orano.group.

Sincerely,



Jeffery Isakson
Chief Executive Officer
Interim Storage Partners LLC

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

Enclosures:

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

Enclosure 1 to E-55033

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-55033 RAI CB-1 (in part)
- Enclosure 2 of E-55033 RAI CB-2 (in part)
- Enclosure 2 of E-55033 RAI CB-3 (in part)
- Enclosure 2 of E-55033 Environmental Report Markup Pages Section 7.2.1 (in part)
- Enclosure 2 of E-55033 Environmental Report Markup Pages Table 7.2-5 (in part)


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.

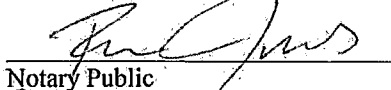
- 1) The information sought to be withheld from public disclosure involves trade secrets and commercial or financial information obtained from a person relating to the WCS CISF, which are owned and have been held in confidence by Interim Storage Partners LLC.
- 2) The information is of a type customarily 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 trade secrets and commercial or financial information obtained from a person relating to the WCS CISF, application of which would 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 7th day of October, 2019.


Notary Public

My Commission Expires 10/16/19

RONDA JONES
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires October 16, 2019