



INTERIM STORAGE PARTNERS

March 16, 2020
E-56212

Director, Division of 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 Replacement Responses for RAI NP-7-10 and RAI NP-7-12 and associated SAR Changed Pages, 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 2," dated March 6, 2019.
 2. Letter from Jeffery D. Isakson to Document Control Desk (NRC), "Submission of ISP Responses for RAIs and Associated Document Markups from First Request For Additional Information, Part 2, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-55362, dated January 17, 2020.
 3. Letter from Jeffery D. Isakson to Document Control Desk (NRC), "Submission of ISP Responses for RAIs and Associated Document Markups from First Request for Additional Information, Part 2, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-55865, dated February 14, 2020.

Interim Storage Partners LLC hereby submits replacement responses to RAI NP-7-10 and RAI NP-7-12 from the First Request for Additional Information; Part 2, issued March 6, 2019 (Reference [1]) and originally responded to in References [2] and [3]. Contained in this submittal are the replacement responses to RAI NP-7-10 and NP-7-12, and associated safety analysis report (SAR) changed pages.

Nm5520

Subsequent to References [2] and [3] submittals, an error was discovered in the work product supporting the RAI responses. ISP has initiated a Corrective Action in accordance with our Quality Assurance Program. As part of that Corrective Action, ISP replacement responses to RAIs NP-7-10 and NP-7-12 and associated SAR changed pages.

SAR Table 7-42, which was submitted as part of the response to RAI NP-7-12, reports frequencies for the soil and Cask Handling Building (CHB) (fixed-base) and their corresponding ratio. The reported frequencies were in error and, therefore, the corresponding ratios were also in error. These ratios are used to determine if soil-structure interaction (SSI) effects are small enough that additional SSI analysis is not required to qualify the design. The updated frequency ratios included in corrected SAR Table 7-42 for the vertical response of the crane support system is substantially less than 2, therefore requiring the detailed design of the CHB to consider an SSI analysis to be performed in accordance with ASCE 4-16. As a result, the response to RAI NP-7-10 and associated SAR changed pages are updated to reflect this.

The design of the CHB remains unchanged because the controlling loads for the building are from the tornado missiles; therefore, there is no impact on the safety of the facility.

The following enclosures are being submitted:

- Enclosure 1 provides a revised response to the RAI NP-7-10 and the response to RAI NP-7-12 (public).
- Enclosure 2 provides the SAR changed pages associated with the RAI responses including the updated Table 7-42 (public)

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

Enclosures:

1. RAI Responses (Public)
2. SAR Changed Pages (Public)

Document Components:

001 PUBLIC Transmittal Letter.pdf, 776,004 bytes
002 PUBLIC Encl 1 RAI Responses.pdf, 133,828 bytes
003 PUBLIC Encl 2 SAR Changed Pages.pdf, 3,921,534 bytes

OSM#1 (Entire Submittal except native files):

001 PUBLIC Transmittal Letter.pdf, 776,004 bytes
002 PUBLIC Encl 1 RAI Responses.pdf, 133,828 bytes
003 PUBLIC Encl 2 SAR Changed Pages.pdf, 3,921,534 bytes