

Enclosure 5 to E-56415

**LA Changed Pages
(Public Version)**

Orano and Waste Control Specialists are well capitalized going concerns in the U.S. nuclear power business.

Below is a summary of the Orano 2018 financial results (results converted to USD based on a 1.10 USD/Euro exchange rate):

Orano Group Positive net cash flow

Net cash flow of 177 MUSD, benefiting from good operating momentum, particularly on the Front End of the cycle and in exports (vs. -280 MUSD in 2017, excluding contribution to earmarked funds).

Reduction in the group's debt, with a 0.8 billion USD decline in net debt (2.53 billion USD, compared to 3.3 billion USD at end-2017).

Orano Group Operating performance above expectations

Resilient EBITDA margin (22.7% vs. an initial target between 19% and 22%), supported by the strong contribution of the performance plan over the year, despite of a moderate decline in revenue (3,985 million USD; -5.7% like-for-like).

Sharp improvement in operating income, in connection with reversals of provisions and no impairments over the period (568 million USD, an increase of +621 million USD).

Full Orano Group annual results available

2018 Press Release:

https://orano.group/docs/default-source/orano-doc/finance/publications-financieres-et-reglementees/2018/resultats-annuels-2018/pr_orano_2018_financial_results.pdf?sfvrsn=a1c39456_14

2018 Consolidated Financial Statements:

https://orano.group/docs/default-source/orano-doc/finance/publications-financieres-et-reglementees/2018/resultats-annuels-2018/orano_20181231_consolidated_financial_statements.pdf?sfvrsn=e8b5c416_6

Waste Control Specialists Summary

Privately-owned Waste Control Specialists is supported by more than \$95 million of investor equity at the end of 2019. Extensive investments were made to create the current uniquely-qualified radioactive waste disposal facility in Andrews County, Texas, with licenses, permits, buildings, equipment and site improvements valued at more than \$150 million at the end of 2019 against less than \$60 million of total debt. The site is also backed by more than \$140M of current surety bonds to ensure continued financial regulatory compliance with the State of Texas.

Orano and Waste Control Specialists will provide initial capitalization of ISP. Orano and Waste Control Specialists will provide periodic capitalization as necessary to execute the business plan of ISP.

The CISF will be located in Andrews County, Texas, adjacent to the existing Waste Control Specialists LLRW facilities that were licensed as a 10 CFR Part 61 equivalent by Texas as an NRC Agreement State. ISP requests a license for 40 years.

1.6.1 Funding of Construction Activities

The funding for constructing the CISF *will be* through future contracts for storage of SNF with the DOE or other SNF Title Holder(s). [

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1.6.2 Funding of Operating Activities

ISP has completed a detailed operating budget for the first 5 years of operations including a 3% per year inflation rate which is shown in Table 1-2. The funding of the operating costs will be through contracts with the customers of ISP, whether the DOE or SNF Title holders at all times when ISP is in possession of the authorized material as required by proposed License Condition 23.

Proprietary Information on This Page
Withheld Pursuant to 10 CFR 2.390

1.6.3 Financial Assurance for Decommissioning

CISF decommissioning costs will be kept to a minimum by designing and operating the CISF in a manner that minimizes contamination pursuant to 10 CFR 20.1406 and 10 CFR 72.130. Waste canisters will not be opened, so the spent nuclear fuel will not be exposed to the CISF facilities, water, air or the surrounding environment. Therefore, the likelihood of a contamination event is considered very low and unlikely as described in the Safety Analysis Report. As a “start-clean/stay-clean” facility, the WCS CISF will operate in a manner that supports decommissioning activities throughout the life of the facility.

ISP *will* use a surety bond combined with a conformity external sinking fund as authorized by 10 CFR 72.30(e)(3). Payments from storage operations *will* be deposited into the external sinking fund as waste is received. A surety bond *will* be used to assure the difference in the decommissioning cost estimate and the value of the sinking fund until the sinking fund is fully funded. *Proposed License Condition 24 ensures that ISP will have funding in place before SNP is received on site.*

Decommissioning costs have been estimated to be \$12,650,000. The decommissioning costs were estimated based on the size of the CISF authorized to store 5,000 MTU consistent with NUREG 1757, *Consolidated Decommissioning Guidance*. Additional information regarding the cost of decommissioning the CISF is provided in Appendix D of the License Application.

LICENSE FOR INDEPENDENT STORAGE OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter 1, Part 72, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, and possess the power reactor spent fuel and other radioactive materials associated with spent fuel storage designated below; to use such material for the purpose(s) and at the place(s) designated below; and to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified herein.

This license is conditioned upon fulfilling the requirements of 10 CFR Part 72, as applicable, the attached Appendix A (Technical Specifications), and the conditions specified below

Licensee

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| 1. Interim Storage Partners LLC (ISP) | 3. License No. SNM-1050
Amendment No. 0 | |
| 2. WCS CISF
9998 Highway 176 West
Andrews, Texas, 79714 | 4. Expiration Date December XX, 20XX
5. Docket or Reference No. 72-1050 | |
| 6. Byproduct, Source, and/or Special Nuclear Material | 7. Chemical and/or Physical Form | 8. Maximum Amount That Licensee May Possess at Any One Time Under This License |
| A. Spent nuclear fuel elements from commercial nuclear utilities licensed pursuant to 10 CFR Part 50, including those stored under either a Part 50 general license or Part 72 specific license, and associated fuel assembly control components and associated radioactive materials related to the receipt, transfer, and storage of that spent nuclear fuel. | A. Intact fuel assemblies, damaged fuel assemblies, failed fuel and fuel debris, as allowed by Materials License SNM-2510, Amendment 4; Table 1-1c or Table 1-1j of Certificate of Compliance No. 1004, Amendments 3 through 13; Table 1-1t of Certificate of Compliance No. 1004, Amendments 10 through 13; Section 2.1 of Certificate of Compliance No. 1029, Amendments 0, 1, and 3; Section B 2.1 of Certificate of Compliance No. 1025, Amendments 0 through 6; Section B 2.1.2 of Certificate of Compliance No. 1015, Amendments 0 through 5; Table B 2-1 of Certificate of Compliance No. 1031, Amendments 0 through 3 Revision 1, and 4 through 5, modified as described in Condition 9 below. | A. 5,000 MT of Uranium or Mixed-Oxide (MOX) in the form of intact spent fuel assemblies, damaged fuel assemblies, failed fuel assemblies, and fuel debris. In addition, the cumulative amount of material received and accepted during the licensed term of the facility may not exceed 5,000 Metric Tons of Uranium plus MOX. |
| B. Greater than Class C Waste, reactor related material generated as a result of plant operations and decommissioning where radionuclide concentration limits of Class C waste in 10 CFR 61.55 are exceeded. | B. Greater than Class C Waste, as activated and potentially surface contaminated metals comprised of miscellaneous solid waste resulting from segmentation and decommissioning processes. | B. 231.3 MT (510,000 pounds) of Greater than Class C Waste. |

**LICENSE FOR INDEPENDENT STORAGE OF SPENT NUCLEAR
FUEL AND HIGH-LEVEL RADIOACTIVE WASTE****SUPPLEMENTARY SHEET**

9. Authorized Use: The material identified in 6.A, 6.B, 7.A and 7.B above is authorized for receipt, possession, storage, and transfer at the WCS Consolidated Interim Storage Facility (WCS CISF), as described in the WCS CISF *Final* Safety Analysis Report (*FSAR*) as *updated*. Storage of fuel is authorized only in canisters referenced in Section 2.1 of the Attachment, Appendix A Technical Specifications and all fuel with assembly average burnup greater than 45 GWd/MTHM shall be canned inside the canister.
10. Authorized Place of Use: The licensed material is to be received, possessed, transferred, and stored at the WCS CISF, geographically located within Andrews County, Texas.
11. The Technical Specifications contained in the Appendix attached hereto are incorporated into the license. The Licensee shall operate the installation in accordance with the Technical Specifications in the Appendix. ■
12. Reserved.
13. Reserved.
14. Reserved.
15. Reserved.
16. The Licensee shall:
- (1) follow the "Physical Protection Plan," Revision 2, as it may be further amended under the provisions of 10 CFR 72.44(e) and 72.186(b);
 - (2) follow the "Safeguards Contingency Plan," Revision 2, as it may be further amended under the provisions of 10 CFR 72.44(e) and 72.186(b); and
 - (3) follow the "Security Training and Qualification Plan," Revision 1, as it may be further amended under the provisions of 10 CFR 72.44(e) and 72.186(b).
17. Construction of the WCS CISF shall not commence before funding (equity, revenue, and debt) is fully committed, that is adequate to construct a facility with the initial capacity as specified by the Licensee to the NRC. Construction of any additional capacity beyond the initial capacity amount shall commence only after funding is fully committed that is adequate to construct such additional capacity.
18. The Licensee shall:
- (1) include in the contracts provisions requiring clients to retain title to the material identified in 6.A, 6.B, 7.A or 7.B, and allocating legal and financial liability among the Licensee and the client(s);
 - (2) include in the contracts provisions requiring clients to periodically provide credit information, and, when necessary, additional financial assurances such as guarantees, prepayment, or payment bond(s);
 - (3) include in the contracts a provision requiring the Licensee not to terminate the license prior to furnishing storage services covered by the contract.
19. The Licensee shall obtain onsite and offsite insurance coverage in the amounts committed to by ISP in the ISP license application.

License No. SNM-1050	Amendment No. 0
Docket or Reference No. 72-1050	

LICENSE FOR INDEPENDENT STORAGE OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE
SUPPLEMENTARY SHEET

20. The Licensee shall submit License Amendment(s) to this license *containing 10 CFR 72.42 compliant AMPs and TLAA*s based on License Renewals of the following CoCs listed below, within 120 days of the effective date of CoC Approval for each of the following:

- (1) Aging Management Program (AMP) for NUHOMS® Systems

The Licensee shall commit to the AMPs committed to in the approved CoC Renewal of CoC 1004 for all NUHOMS® Spent Fuel Canisters and storage overpacks.

- (2) AMP for NAC Systems

The Licensee shall commit to the AMPs committed to in the approved CoC Renewal of CoC 1015 AND 1025 AND 1031 for all applicable NAC Spent Fuel Canisters and storage overpacks. *In the event that the current CoC holder for CoC 1015 and/or 1025 and/or 1031 does not submit a timely renewal as defined in 10 CFR Part 72.240, ISP shall submit a license amendment with AMP and TLAA information within one (1) year following the timely renewal deadline defined in 10 CFR 72.240 (b), for the applicable CoC.*

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21. The Licensee shall submit a Startup Plan to the NRC at least 90 days prior to receipt and storage of the material identified in 6.A, 6.B, 7.A or 7.B at the facility.

RAI PLC-2



22. *A Post-Transportation Verification shall include an evacuated volume helium leak test on 100% of the canisters that are received at the WCS CISF to ensure that the accessible portions of the confinement boundary are leak tight as defined in ANSI N14.5 following transport to the site.*

23. Prior to commencement of operations, the Licensee shall have an executed contract with the U.S. Department of Energy (DOE) or other SNF Title Holder(s) stipulating that the DOE or the other SNF Title Holder(s) is/are responsible for funding operations required for storing the material identified in 6.A, 6.B, 7.A or 7.B at the CISF as licensed by the U.S. Nuclear Regulatory Commission.

24. Prior to receipt of the material identified in 6.A, 6.B, 7.A or 7.B, the Licensee shall have a financial assurance instrument required pursuant to 10 CFR 72.30 acceptable to the U.S. Nuclear Regulatory Commission.

25. This license is effective as of the date of issuance shown below.

RAI PLC-3



FOR THE NUCLEAR REGULATORY COMMISSION

John McKirgan, Chief
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material
Safety and Safeguards

Date of Issuance December XX, 20XX

Attachments: Appendix A –WCS Interim Storage Facility Technical Specifications