



## INTERIM STORAGE PARTNERS

May 22, 2020  
E-56739

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 Revision 3 of the Safety Analysis Report for the WCS CISF,  
Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002

- Reference:**
1. Letter from Elicia B. Sanchez to NRC Document Control Desk, "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-53364, dated January 7, 2019
  2. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Submittal of Partial Response to First RAI, Part 1, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-54257, dated May 31, 2019
  3. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Submittal of Additional Partial Response to First RAI, Part 1, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-54422, dated June 28, 2019
  4. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Supplemental Information for RAI Part 1 in Support of RAI NP-2.4-1 and NP-2.4-2, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-54979, dated August 20, 2019
  5. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Submittal of Responses to Transportation First RAIs, Part 3, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-55363, dated November 21, 2019

6. Letter from Jeffery D. Isakson to NRC Document Control Desk, "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
7. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Submission of ISP Revised Responses for RAI NP-15-7, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-55866, dated January 22, 2020
8. Letter from Jeffery D. Isakson to NRC Document Control Desk, "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
9. Letter from Jeffery D. Isakson to NRC Document Control Desk, "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-56069, dated February 14, 2020
10. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Clarifications to Support NRC's Continued Review of the Safety Case for the WCS CISF, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-56259, dated March 11, 2020
11. Letter from Jeffery D. Isakson to NRC Document Control Desk, "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," E-56212, dated March 16, 2020
12. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Submission of ISP Responses for RAIs and Associated Document Markups from First Request for Additional Information, Parts 2, 3, and 4, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-56415, dated April 7, 2020
13. Letter from Jeffery D. Isakson to NRC Document Control Desk, "Submission of ISP Responses for RAIs and Associated Document Markups from First Request for Additional Information, Parts 2, 3, and 4, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-56483, dated May 18, 2020


Interim Storage Partners LLC (ISP) hereby submits Revision 3 of the Safety Analysis Report (SAR) for the WCS CISF. Revision 3 incorporates all of the changes submitted via References [1] through [13]. In addition to the changes submitted in References [1] through [13], the table of contents has been updated, editorial changes have been made to Sections 1.2.4.1, 3.2.3.3, 3.3.5.2 and 4.1.2.3, the distance between the double fences listed in Section 4.1.2 has been updated to be consistent with the Physical Security Plan, Section 1.1 has been updated to reflect the current status of License Renewal Applications that have been submitted to the NRC, and Section 11.5 has been updated for consistency with the response to RAI PLC-3 submitted with Reference [12].

The following enclosures are being submitted:

- Enclosure 1 includes affidavits pursuant to 10 CFR 2.390 for ISP, TN Americas, and NAC International.
- Enclosure 2 provides a proprietary version of SAR, Revision 3.
- Enclosure 3 provides a public version of Enclosure 2 (SAR Revision 3)

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](mailto:jack.boshoven@orano.group).

Sincerely,

 Digitally signed  
by ISAKSON  
Jeffery

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. Affidavit Pursuant to 10 CFR 2.390
  - a. Interim Storage Partners
  - b. TN Americas
  - c. NAC International
2. Safety Analysis Report, Revision 3 (Proprietary Version)
3. Safety Analysis Report, Revision 3 (Public Version)

**Document Components:**

001 PUBLIC ISP Transmittal Letter.pdf, 351,578 bytes  
002 PUBLIC Enc 1 Affidavit.pdf, 2,803,997 bytes  
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