

Attachment 1 to Holtec Letter 5025053
HI-STORE RAI Part 5 Responses June 2020

RAI 2-3 Clarify the contradictory statements in the SAR regarding the existence of a producing oil/gas well in the southwest portion of the proposed CISF site. Additionally, clarify whether the former producing well, as stated in SAR Section 2.1.2, "Site Description," is the same well described as an active oil/gas well in SAR Section 2.2.2, "Pipelines," in the southwest portion of the proposed CISF site.

Section 2.2.2 of the SAR, "Pipelines," states that an oil/gas producing well exists at the proposed site. The SAR Figure 2.1.2 also shows a producing well in the southwest corner of the facility.

However, SAR Section 2.1.2, "Site Description," and SAR Section 6.5.2 (d), "Potential Fire Hazards," state "[t]here are no active wells on the site..." SAR Section 2.1.2 also lists a former producing gas and distillate well near the communication tower.

This information is necessary to determine compliance with 10 CFR 72.24(a), 72.90(a) through (d), 72.94, and 72.98.

Holtec Response

Sections 2.1.2 and 2.2.2 have been revised to clarify the description of oil/gas facilities located within the Property and those specifically in Section 13. The HI-STORE Facility will be located within Section 13 however all of the structures described will either be removed prior to construction (as noted) or remain outside the footprint of the facility.

Section 6.5.2 (d) has been revised to clarify location of structures in relation to the property and HI-STORE facility itself.

2-4 Confirm whether there is a telephone line within the proposed site. Section 2.1.2 of the SAR, "Site Description," does not list a telephone line going through the proposed site; however, SAR Figure 2.1.21 shows a telephone line.

This information is necessary to determine compliance with 10 CFR 72.24(a), 72.90(a) through (d), 72.94, and 72.98.

Holtec Response

The figure showing the telephone line has been removed. There is no telephone line in the area of the proposed facility. Updated figures have been added to Section 2.1 to better illustrate the nearby structures.

2-5 Clarify how the structures currently on the proposed site would be dealt with during construction and operation phases of the proposed facility in SAR Section 2.1.2, "Site Description."

Section 2.1.2 of the SAR identifies several existing structures at the proposed site. However, no information has been presented in the SAR as to what happens to the following existing structures at the site during construction and operation phases of the proposed facility: (1) a communication tower, (2) two oil recovery facilities with associated hardware, and (3) a producing oil/gas well. The applicant should describe the proposed plan(s) to deal with each of the existing structures at the proposed site during the construction and/or operational phases of the proposed facility. The description should include detailed characteristics of the existing

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structures and assessments of potential hazards posed by them to the proposed facility if they would not be dismantled or, in the case of the producing oil/gas wells, abandoned and plugged.

This information is necessary to determine compliance with 10 CFR 72.24(a), 72.90(a) through (d), 72.94, and 72.98.

Holtec Response

Section 2.1.2 has been revised to clarify the location of structures on the Property. The section has been revised to clarify which of the structures are to be removed and that the rest are not within the footprint of the HI-STORE facility. The structures not being removed will have no impact on construction and the hazards to the operating facility are currently discussed.

Additional changes to this section may occur as a result of ongoing evaluations in response to remaining Chapter 2 RAIs.

2-9 Provide the exact location of the Intrepid East Mine and other past mining-related activities around the proposed CISF site, including their current status in SAR Section 2.1.4, "Land and Water Use." Additionally, provide the location of all nearby mine shafts, currently in operation or abandoned, near the proposed CISF.

Section 2.1.3 of the SAR, "Population Distribution and Trends," lists the Intrepid East Mine at a distance of 7.8 km [4.9 mi] east of the proposed CISF; however, SAR Section 2.1.4, "Land and Water Use," states that the Intrepid East facility is nearly 9.6 km [6 mi] to the southwest of the proposed site. This discrepancy should be resolved. Additionally, the location of all mines near the proposed site, including the National Potash Mine, as stated in SAR Section 2.2, "Nearby Industrial, Transportation, Military, and Nuclear Facilities," should be plotted in a scaled map and appropriately labeled for identification. In addition, SAR Section 2.2 states that the potash ore is mined by boring machines and raised to the surface through mine shafts at the National Potash Mine, approximately 6.7 km [4.2 mi] west of the proposed site. Locations of these mine shafts at the National Potash Mine, or other mine shafts currently in operation or abandoned near the proposed facility, are not identified in the SAR.

This information is necessary to determine compliance with 10 CFR 72.24(a), 72.90(a) through (d), 72.94, and 72.98.

Holtec Response

Sections 2.1.3 and 2.1.4 have been revised to clarify the direction and distance to Intrepid surface facilities.

Section 2.2 has been revised to clarify current mine workings and a figure has been added to show the proximity of existing mine workings to the facility.

RAI 2-23:

An aqueduct runs through the southeast portion of the proposed CISF (SAR Figure 2.1.9). Provide additional information to clarify (1) the function, structural integrity, and status, and (2) effects of the aqueduct on flood water build-up within and around the proposed CISF, particularly during extreme weather events.

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Section 2.1.2 of the SAR stated that “a small water drinker (livestock) is located along the aqueduct in the northern half of the Site.” The aqueduct was clearly identified in SAR Figures 2.1.8 and 2.1.9 and is clearly visible in satellite picture in SAR Figure 2.1.7. In southeast New Mexico, the Pecos River Flume, an aqueduct, was constructed to provide water to the Carlsbad Irrigation System and may sometimes hold standing water (Carlsbad Irrigation District, 1905). It is likely that standing water may also occur in the aqueduct on the CISF site. Additional information is needed to determine if standing water in the aqueduct, particularly during extreme weather events, may impact land surface flood water build-up within and around the proposed CISF.

This information is necessary to demonstrate compliance with 10 CFR 72.122(b)(2).

Reference

1. Carlsbad Irrigation District, 1905. Pecos River Flume - Photographic copy of historic photo. <https://www.loc.gov/resource/hhh.nm0202.photos/?sp=19>.

Holtec Response

There is no aqueduct on the Property. The “aqueduct” labeled in Figure 2.1.9 refers to a water pipeline.

A note has been added to Figure 2.1.9 to clarify this distinction.