



INTERIM STORAGE PARTNERS

January 24, 2022
E-60304

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: Request for Amendment to the Part 72 Specific License SNM-2515 for Interim Storage Partners LLC's WCS CISF, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002

Reference: 1. NRC License SNM-2515

Pursuant to 10 CFR 72.56, Interim Storage Partners (ISP) requests that License Condition 17 of License SNM-2515 be revised to clarify the timing of mandatory Consolidated Interim Storage Facility (CISF) license amendments relating to incorporation of Aging Management Programs of Part 72 General Licensing that are incorporated by reference in SNM-2515.

As discussed in Enclosure 1, since the CISF is in a pre-construction status and there is no impact to either the Safety or Environmental aspects of the CISF, the change is solely administrative in nature. Accordingly, ISP requests that immediate action be taken as authorized under 10 CFR 72.46(b)(2), and that the NRC issue the requested amendment to SNM-2515 as soon as practicable.

Please contact Jack Boshoven at jack.boshoven@orano.group if you have any questions.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on: January 24, 2022

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. ISP's Evaluation of Proposed Change to License Condition 17 (Public)
2. Proposed Changes to Materials License SNM-2515 (Public)

Enclosure 1: ISP's Evaluation of Proposed Change to License Condition 17

The Interim Storage Partners LLC (ISP) license amendment request dated January 24, 2022 proposes an administrative change to the current SNM 2515 license. The proposed change clarifies the timing for ISP to satisfy License Condition 17. License Condition 17 currently states:

“To conform with the requirements of 10 CFR 72.42, the Licensee shall submit a request for license amendment(s) to incorporate any technically applicable provisions of the Aging Management Programs (AMPs) and Time-Limited Aging Analyses (TLAAs) approved in future renewals of NAC Systems CoCs 1015 and 1025 and 1031, for all applicable NAC spent fuel canisters and storage overpacks.

The Licensee shall submit the amendment request(s) within 120 days of the effective date of the applicable CoC approval. 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, the Licensee shall submit a license amendment request, incorporating AMP and TLAA information compliant with 10 CFR 72.42, within one (1) year following the timely renewal deadline defined in 10 CFR 72.240(b) for the applicable CoC.”

ISP's proposed change is to clarify when the incorporation of any technically relevant portions of AMPs in renewals of CoCs 1015, 1025, and 1031 is required so that incorporation of AMPs and TLAAs can be combined with future amendments of SNM-2515. By allowing the requested clarification, ISP will achieve efficiency and savings through [combination of technically similar license amendment requests and] the minimization of license amendments. Likewise, demands on the NRC Staff will also be reduced. ISP's proposed schedular clarification does not impact the design, environmental analyses, the Final Safety Analysis Report, future operation or future procedures of the facility.

ISP's proposed change is signified by **bold** text in the following paragraphs:

To conform with the requirements of 10 CFR 72.42, the Licensee shall submit a request for license amendment(s) to incorporate any technically applicable provisions of the Aging Management Programs (AMPs) and Time-Limited Aging Analyses (TLAAs) approved in future renewals of NAC Systems CoCs 1015 and 1025 and 1031, for all applicable NAC spent fuel canisters and storage overpacks.

For the CoCs listed in this license condition, the Licensee shall submit amendment request(s) within the later of (a) 120 days prior to the commencement of operations or (b) 120 days of the effective date of the CoC renewal for canisters in storage at the CISF. 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, the Licensee shall submit a license amendment request, incorporating AMP and TLAA information compliant with 10 CFR 72.42, within one (1) year following the timely renewal deadline defined in 10 CFR 72.240(b) for the applicable CoC.

Technical Justification:

There is no technical change as the modification is limited solely to clarifying the schedule for the incorporation of AMPs and TLAAs, the incorporation of which is already required by the license SNM-2515. The proposed change does not impact the requirement that all canisters with renewed general license CoCs must have AMPs and TLAAs incorporated in SNM-2515 prior to receipt and storage of those canisters at ISP's WCS CISF. The change has no impact on the design, function, or operation of any structures, systems, or components described by the FSAR. Therefore, the change does not reduce the level of safety imposed by the current license.

Safety Assessment and No Genuine Issue Determination:

The proposed change is solely administrative in nature. There will be no change to the design of ISP's WCS CISF of the scope or type of operations authorized by the license as a result of the proposed change. As ISP's WCS CISF is in a preconstruction and pre-operational state, there will be no procedure revisions that affect operation, maintenance, or performance of surveillance on the facility as a result of the proposed change. Therefore, consistent with 10 CFR 72.46(b)(2), the proposed change does not present a genuine issue as to whether public health and safety will be significantly affected.

Environmental Impact Consideration:

ISP has reviewed the proposed amendment and concluded that the request is eligible for a categorical exclusion from the requirement to prepare an environmental assessment or an environmental impact statement in accordance with 10 CFR 51.22(c)(12) (iii). The basis for this conclusion is that the request will involve issuance of an amendment to the ISFSI license pursuant to Part 72 that solely clarifies a schedular requirement and is therefore administrative in nature.

Conclusion:

The proposed change to SNM-2515 License Condition 17 does not alter the prior staff conclusions and findings made in support of the granting of the license and will not impact the public health and safety. Accordingly, SNM-2515, amended as proposed herein, would continue to meet the requirements of 10 CFR Part 72.

Enclosure 2 to E-60304

**Proposed Changes to Materials License SNM-2515
(Public)**

License No. Amendment No.

SNM-2515 1

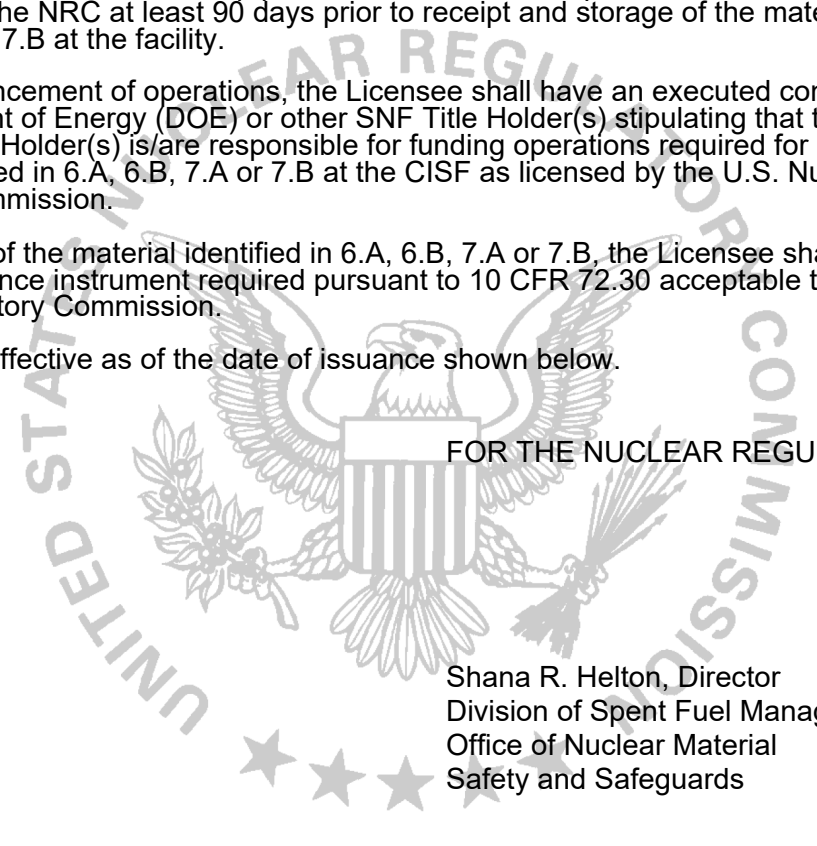
Docket or Reference No.

72-1050

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

17. To conform with the requirements of 10 CFR 72.42, the Licensee shall submit a request for license amendment(s) to incorporate any technically applicable provisions of the Aging Management Programs (AMPs) and Time-Limited Aging Analyses (TLAAs) approved in future renewals of NAC Systems CoCs 1015 and 1025 and 1031, for all applicable NAC spent fuel canisters and storage overpacks.
- For the CoCs listed in this license condition, the Licensee shall submit amendment request(s) within the later of (a) 120 days prior to the commencement of operations or (b) 120 days of the effective date of the CoC renewal for canisters in storage at the CISF. 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, the Licensee shall submit a license amendment request, incorporating AMP and TLAA information compliant with 10 CFR 72.42, within one (1) year following the timely renewal deadline defined in 10 CFR 72.240(b) for the applicable CoC.*
18. The Licensee shall submit a startup plan as described in Chapter 13 of the WCS CISF FSAR, as updated, 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.
19. 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.
20. 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.
21. This license is effective as of the date of issuance shown below.

FOR THE NUCLEAR REGULATORY COMMISSION



Shana R. Helton, Director
Division of Spent Fuel Management
Office of Nuclear Material
Safety and Safeguards

Date of Issuance September 13, 2021

Attachments: Appendix A –WCS Consolidated Interim Storage Facility Technical Specifications