

**INTERIM STORAGE  
PARTNERS**

72-1050

March 12, 2019  
E-53819

Director, Division of Spent 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 Draft Responses for RAIs NP-2.2-1, NP-2.2-2 and EP-X and Associated Document Markups for March 20, 2019 Meeting

**Reference:** 1. Letter from John-Chau Nguyen (NRC) to Jeffery D. Isakson, "Interim Storage Partners' License Application to Construct and Operate the Waste Control Specialists Consolidated Interim Storage Facility, Andrews County, Tx, Docket 72-1050 – First Request for Additional Information, Part 1," dated November 16, 2018

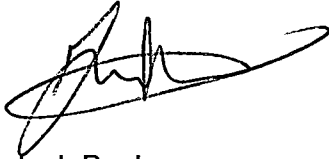
Interim Storage Partners LLC hereby submits its draft RAI responses for the meeting scheduled for March 20, 2019 to discuss RAIs NP-2.2-1 and NP-2.2-2 and all of the RAIs related to the Consolidated Emergency Response Plan.

The proprietary RAI responses are provided in Enclosures 2 through 4. The draft Consolidated Emergency Response Plan incorporating the changes described in the RAI responses is provided in Enclosure 5. Enclosure 6 includes the proprietary report which forms the basis for the response to RAI NP-2.2-1 and the proprietary calculation that supports the response to RAP NP-2.2-2. Affidavits (Enclosure 1) are provided for the proprietary information. Enclosure 7 provides the non-proprietary versions of the all of the RAI responses. The Enclosure 6 documents are entirely proprietary and no non-proprietary versions are included.

Should you have any questions regarding this submission, please contact me by telephone at (410) 910-6955, or by email at jack.boshoven@orano.group.

NM5520  
NM5526

Sincerely,



Jack Boshoven  
Chief Engineer CISF, Licensing and Engineering  
Interim Storage Partners LLC

cc: John-Chau Nguyen, Senior Project Manager, U.S. NRC  
Richard Turtill, U.S. NRC  
Jeff Isakson, ISP LLC  
Elicia Sanchez, ISP LLC  
Renee Murdock, ISP LLC

Enclosures:

1. Affidavits Pursuant to 10 CFR 2.390
  - a. Waste Control Specialists
  - b. Interim Storage Partners
2. Draft Response to RAI NP-2.2-1 with SAR Markups (Proprietary Version)
3. Draft Response to RAI NP-2.2-2 with SAR Markups (Proprietary Version)
4. Draft Responses to RAI EP-X (Proprietary Version)
5. Draft Consolidated Emergency Plan Revision 2.08.2019
6. Calculations (Proprietary)
  - a. Aircraft Hazard Evaluation Report Revision 0
  - b. WCS01-0211 Revision 0
7. Draft RAI Responses to RAIs NP-2.2-1, NP-2.2-2 and EP-X (Non-Proprietary Version)

## **Enclosure 1**

**Affidavits Pursuant to 10 CFR 2.390**

WASTE CONTROL SPECIALISTS LLC

**AFFIDAVIT**

I, Elicia Sanchez, Senior Vice President of Key Initiatives and Communication at Waste Control Specialists LLC (WCS), am making the following representations that to the best of my knowledge and beliefs:

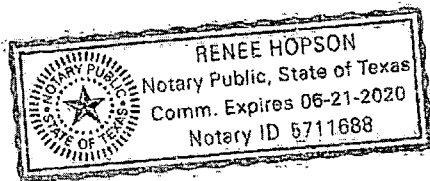
1. The following document which WCS wishes to have withheld from public disclosure is:
  - a) **Emergency Information List which is part of the RAI EP-8 response.**
  - b) **Marked SAR sections associated with RAIs NP-2.2-1 and NP-2.2-2 responses.**
2. The information contained in the document cited in 1 above is considered confidential information pursuant to Title 10 of the Code of Federal Regulations (CFR), Part 2.390(a)(4) and is thereby protected from public disclosure by regulation.
3. Pursuant to 10 CFR 2.390, the information contained in the document cited in 1 above is protected from public disclosure by regulation because it includes correspondences and reports to the NRC which contain trade secrets or commercial information pursuant to 10 CFR 2.390(a)(4).
4. The information contained in the document cited in 1 above has not been made available to public sources by WCS, nor has WCS authorized that it be made available.

Elicia Sanchez      3.12.19  
Elicia Sanchez      Date  
Senior VP of Key Initiatives and Communication

I certify the above named person appeared before me and  
executed this document on this the 12 day of March, 2019

Renee Hopson  
Notary Public

My commission expires: 6-21-2020



**AFFIDAVIT PURSUANT**  
**TO 10 CFR 2.390**

ISP LLC                     )  
State of Maryland        )     SS.  
County of ~~Howard~~        )

*MONTGOMERY*

I, Jeffery Isakson, depose and say that I am Chief Executive Officer/President; Interim Storage Partners LLC duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information that is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought applies to the following documents listed below:

- Calculation WCS01-0211, Hazard Analysis of Gas Pipeline for WCS CISF, Revision 0
- Calculation 1BAT5D001-CALC-01, Aircraft Hazard Evaluation Of The Consolidated Interim Storage Facility (CISF), Revision 0

These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Interim Storage Partners LLC in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves calculations related to the design of the WCS CISF, which are owned and have been held in confidence by Interim Storage Partners LLC.
- 2) The information is of a type customarily held in confidence by Interim Storage Partners LLC, and not customarily disclosed to the public. Interim Storage Partners LLC has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of Interim Storage Partners LLC, because the information consists of descriptions of the design and analysis of the WCS CISF, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Interim Storage Partners LLC, take marketing or other actions to improve their product's position or impair the position of Interim Storage Partners LLC product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.



Jeffery Isakson  
Chief Executive Officer/President, Interim Storage Partners LLC

Subscribed and sworn before me this 11<sup>th</sup> day of March, 2019.

*Lewis G. Piccolino*  
Notary Public

My Commission Expires 03/26/2019

