

November 21, 2019 E-55363

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 ISP Responses for RAIs and Associated Document

Markups from First Request For Additional Information, Part 3, Docket 72-

1050 CAC/EPID 001028/L-2017-NEW-0002

Reference:

- Letter from John-Chau Nguyen (NRC) to Jeffery D. Isakson, "Interim Storage Partners LLC's License Application To Construct And Operate The Waste Control Specialists Consolidated Interim Storage Facility, Andrews County, Texas, Docket No. 72-1050 – First Request For Additional Information, Part 3," dated April 23, 2019
- 2. Letter from Jack Boshoven to John-Chau Nguyen (NRC), "Interim Storage Partners (ISP) First Request for Additional Information (RAI) Proposed Submittal Schedule, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002," E-54395, dated May 31, 2019

Interim Storage Partners LLC hereby submits responses to RAIs from First Request for Additional Information; Part 3 issued April 23, 2019 (Reference [1]) to support the continued review of the Licensing Application. Contained in this submittal are the responses; including revised safety analysis report (SAR), Environmental Report (ER), and other supporting documents, which incorporate comments from our October 24, 2019 meeting with the NRC discussing our draft responses to these RAIs. This submittal is consistent with the schedule identified in Table 4 of Reference [2].

The following enclosures are being submitted:

- Enclosure 1 includes an affidavit pursuant to 10 CFR 2.390 for Interim Storage Partners.
- Enclosure 2 provides a proprietary version of the responses to the RAIs.

- Enclosure 3 provides a public version of Enclosure 2 (RAI responses)
- Enclosure 4 provides a description of additional changes that are not associated with the RAI
- Enclosure 5 provides a proprietary version of the attachments to RAI responses (Attachments LU-2-1, WR-5-1, WR-5-2 and ECO-1-1)
- Enclosure 6 provides the SAR changed pages associated with the RAI responses
- Enclosure 7 provides a proprietary version of the ER changed pages associated with the RAI responses
- Enclosure 8 provides a public version of Enclosure 5 (Attachments LU-2-1, WR-5-1, WR-5-2 and ECO-1-1)
- Enclosure 9 provides a public version of Enclosure 7 (ER changed pages)
- Enclosure 10 applicable sections of Waste Control Specialists' "Application for License to Authorize Near Surface Land Disposal of Low-Level Radioactive Waste" (dated 2007)
- Enclosure 11 CMEC Report referenced in RAI PA-3 Response (Proprietary)
- Enclosure 12 Appendix E HEC-HMS Input for the Flood Plain Report
- Enclosure 13 native files associated with RAI responses

Please note that Enclosures 12 and 13 deviate from the NRC guidance on electronic submittals as described above.

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.

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

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## **Enclosures:**

- 1. Affidavit Pursuant to 10 CFR 2.390
  - a. Interim Storage Partners
- 2. RAI Responses (Proprietary Version)
- 3. RAI Responses (Public Version)
- 4 Changes not associated with an RAI response
- 5. RAI Response Attachments (Proprietary Version)
  - a. Attachment LU-2-1
  - b. Attachment WR-5-1
  - c. Attachment WR-5-2
  - d. Attachment ECO-1-1
- 6. SAR Changed Pages
- 7. ER Changed Pages (Proprietary Version)
- 8. RAI Response Attachments (Public Version)
  - a. Attachment LU-2-1
  - b. Attachment WR-5-1
  - c. Attachment WR-5-2
  - d. Attachment ECO-1-1
- 9. ER Changed Pages (Public Version)
- 10. Applicable sections of Waste Control Specialists' "Application for License to Authorize Near Surface Land Disposal of Low-Level Radioactive Waste," dated 2007 (Public)
  - a. Appendix 2.3.1: Meteorological and Climatology Data
  - b. Appendix 2.3.1-2: Meteorological System
  - c. Figures 5-10 and 5-10a of Appendix 2.6.1
  - d. Attachment 2-1 to Appendix 2.6.1.pdf
  - e. Attachment 6-4 (Water Quality Analysis Of Baker Spring Ponded Water, November 2004) to Appendix 2.6.1
  - f. Attachment 6-6 (Groundwater Age Dating) to Appendix 2.6.1
  - g. Appendix 2.9.1: Ecological Assessment
  - h. Section 2.4.2 (Transportation Impact Analysis) of Attachment A to Appendix 11.1.1.
  - i. Figures 1 through 24 of Attachment A to Appendix 11.1.1
  - j. Appendix 11.9.2: Ecological Baseline Assessment
- 11. CMEC Report referenced in RAI PA-3 Response (Proprietary)
- 12. Appendix E HEC-HMS Input for the Flood Plain Report (Proprietary)
- 13. Native files associated with RAI responses (Proprietary)
  - a. LU-2 Oil and Gas Well Information WCS CISF PROPRIETARY.xlsx
  - b. Oil and Gas Leases Within 6 Miles of the CISF Proprietary 300 FLAT.pdf
  - c. ER Tower 1-1-2010 to 5-31-2015.xlsx
  - d. Tower 1\_1\_1\_2010-5\_31\_2015.xlsx
  - e. WH East 1-12-2011 to 5-31-2015.xlsx
  - f. WH West 12-18-2010 to 5-31-2015.xlsx
  - g. T190815 EMISSIONS ESTIMATES.xlsx

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## **Document Components:**

001 PUBLIC Transmittal Letter.pdf, 674,666 bytes 002 PUBLIC Encl 1 Affidavit.pdf, 495,451 bytes 003 SUNSI Encl 2 RAI Responses.pdf, 9,136,979 bytes, Proprietary 004 PUBLIC Encl 3 RAI Responses.pdf, 6,110,228 bytes 005 PUBLIC Encl 4 Non-RAI changes.pdf, 122,699 bytes 006 SUNSI Encl 5 RAI Response Attachments.pdf, 43,480,219 bytes, Proprietary 007 PUBLIC Encl 6 SAR Changed Pages Part 1 of 5.pdf, 38,740,931 bytes 008 PUBLIC Encl 6 SAR Changed Pages Part 2 of 5.pdf, 70,502,316 bytes 009 PUBLIC Encl 6 SAR Changed Pages Part 3 of 5.pdf, 90,300,747 bytes 010 PUBLIC Encl 6 SAR Changed Pages Part 4 of 5.pdf, 87,271,849 bytes 011 PUBLIC Encl 6 SAR Changed Pages Part 5 of 5.pdf, 79,010,844 bytes 012 SUNSI Encl 7 ER Changed Pages.pdf, 84,998,884 bytes, Proprietary 013 PUBLIC Encl 8 RAI Response Attachments.pdf, 5,644,994 bytes 014 PUBLIC Encl 9 ER Changed Pages.pdf, 71,317,414 bytes 015 PUBLIC Encl 10 Applicable sections of LLRW License.pdf, 142,147,396 bytes 016 SUNSI Encl 11 CMEC Report.pdf, 18,473,570 bytes, Proprietary 017 SUNSI Encl 12 Appendix E HEC-HMS Input (folder), 62,311,482 bytes, Proprietary 018 SUNSI Encl 13 Native files (folder), 65,858,114 bytes, Proprietary

## OSM#1 (Entire Submittal):

001 PUBLIC Transmittal Letter.pdf, 674,666 bytes 002 PUBLIC Encl 1 Affidavit.pdf, 495,451 bytes 003 SUNSI Encl 2 RAI Responses.pdf, 9,136,979 bytes, Proprietary 004 PUBLIC Encl 3 RAI Responses.pdf, 6,110,228 bytes 005 PUBLIC Encl 4 Non-RAI changes.pdf, 122,699 bytes 006 SUNSI Encl 5 RAI Response Attachments.pdf, 43,480,219 bytes, Proprietary 007 PUBLIC Encl 6 SAR Changed Pages Part 1 of 5.pdf, 38,740,931 bytes 008 PUBLIC Encl 6 SAR Changed Pages Part 2 of 5.pdf, 70,502,316 bytes 009 PUBLIC Encl 6 SAR Changed Pages Part 3 of 5.pdf, 90,300,747 bytes 010 PUBLIC Encl 6 SAR Changed Pages Part 4 of 5.pdf, 87,271,849 bytes 011 PUBLIC Encl 6 SAR Changed Pages Part 5 of 5.pdf, 79,010,844 bytes 012 SUNSI Encl 7 ER Changed Pages.pdf, 84,998,884 bytes, Proprietary 013 PUBLIC Encl 8 RAI Response Attachments.pdf, 5,644,994 bytes 014 PUBLIC Encl 9 ER Changed Pages.pdf, 71,317,414 bytes 015 PUBLIC Encl 10 Applicable sections of LLRW License.pdf, 142,147,396 bytes 016 SUNSI Encl 11 CMEC Report.pdf, 18,473,570 bytes, Proprietary 017 SUNSI Encl 12 Appendix E HEC-HMS Input (folder), 62,311,482 bytes, Proprietary 018 SUNSI Encl 13 Native files (folder), 65,858,114 bytes, Proprietary

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## OSM#2 (Public Information Only):

001 PUBLIC Transmittal Letter.pdf, 674,666 bytes

002 PUBLIC Encl 1 Affidavit.pdf, 495,451 bytes

004 PUBLIC Encl 3 RAI Responses.pdf, 6,110,228 bytes

005 PUBLIC Encl 4 Non-RAI changes.pdf, 122,699 bytes

007 PUBLIC Encl 6 SAR Changed Pages Part 1 of 5.pdf, 38,740,931 bytes

008 PUBLIC Encl 6 SAR Changed Pages Part 2 of 5.pdf, 70,502,316 bytes

009 PUBLIC Encl 6 SAR Changed Pages Part 3 of 5.pdf, 90,300,747 bytes

010 PUBLIC Encl 6 SAR Changed Pages Part 4 of 5.pdf, 87,271,849 bytes

011 PUBLIC Encl 6 SAR Changed Pages Part 5 of 5.pdf, 79,010,844 bytes

013 PUBLIC Encl 8 RAI Response Attachments.pdf, 5,644,994 bytes

014 PUBLIC Encl 9 ER Changed Pages.pdf, 71,317,414 bytes

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