



*Private Fuel Storage, LLC*

*P.O. Box C4010, La Crosse, WI 54602-4010*

*John D. Parkyn, Chairman of the Board*

U.S. Nuclear Regulatory Commission  
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February 2, 2000

**LICENSE APPLICATION AMENDMENT No. 9**  
**DOCKET NO. 72-22/TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

- References:
1. PFS letter Donnell to U.S. NRC, Commitment Resolution Letter #25, dated January 18, 2000
  2. PFS letter Donnell to U.S. NRC, Commitment Resolution Letter #24, SER Open Items, dated January 14, 2000
  3. NRC letter Delligatti to Parkyn, Safety Evaluation Report for Systems Not Directly Associated with Storage Casks, dated December 15, 1999
  4. PFS letter Donnell to U.S. NRC, Commitment Resolution Letter #23, dated January 7, 2000
  5. PFS letter Donnell to U.S. NRC, Submittal of Commitment Resolution Information, dated March 24, 1999

The purpose of this letter is to submit Amendment No. 9 to the Private Fuel Storage Facility (PFSF) License Application (LA). Major changes of this amendment include:

- The License Application has been revised to add an Appendix that includes PFS commitment letters submitted to the NRC subsequent to the final request for additional information (RAI) responses associated with the PFSF Safety Analysis Report (SAR) and Environmental Report (ER). In addition, the License Application has been revised to emphasize that neither construction nor operation of the PFSF shall commence until adequate funding for each of these phases has been committed.

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- The discussion of aircraft crash hazard in Section 2 of the SAR has been revised to reflect the latest changes to the report that addresses this topic, as discussed in Reference 1.
- The SAR has been revised to incorporate information addressing those open items/outstanding issues identified in References 2 and 3.
- The SAR has been revised to address several remaining geotechnical issues that are discussed in Reference 4. These include credit for the beneficial effects of soil cement beneath and around the cask storage pads. The soil cement provides increased resistance to sliding and overturning (dynamic bearing capacity) of the pads due to the design basis ground motion. In addition, a discussion of the overturning analyses of the Canister Transfer Building has been added to the SAR.
- The SAR has also been revised to address issues identified by Mark Delligatti of the NRC in a phone conversation on January 21, 2000 with personnel at Stone & Webster. These include: additional justification in the aircraft crash hazards analysis for assumptions related to the evaluation of Military Airway IR-420, with the SAR revised to refer to the latest revision of this analysis; clarification of the probabilistic seismic hazard assessment (PSHA) formulation, and thermal information related to the PFSF site, by incorporating information in the SAR which was submitted to the NRC in Reference 5; a discussion of the reason for the important-to-safety classification of the seismic support struts; additional information on wildfires and their potential effects; a discussion of the basis for selection of off-normal events and accident conditions evaluated in SAR Chapter 8; additional information on the potential threats from the Tekoi rocket engine test facility, cruise missiles, hanging bombs, the X-33 experimental aircraft, and testing of conventional, chemical and biological weapons at the Dugway Proving Grounds.
- Added a new section to the SAR accident analyses which evaluates the effects on the storage casks of long term exposure to extreme environmental temperatures (125°F ambient air temperature). Revised the accident analysis on fires to amplify the discussion of wildfire effects.

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If you have any questions regarding this submittal, please contact me at 608-787-1236 or Mr. J. L. Donnell, Project Director, at 303-741-7009.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Parkyn" followed by a stylized flourish.

John D. Parkyn, Chairman  
Private Fuel Storage L.L.C.

JDP:JRJ

Enclosures

# **PREFACE**

## **PRIVATE FUEL STORAGE FACILITY**

### **LICENSE APPLICATION**

#### **AMENDMENT 9**

Enclosed are the following revisions to the Private Fuel Storage Facility License Application documents:

Safety Analysis Report - Revision 9

License Application – Revision 6

The revisions are provided in the replacement page format. If a page has changed, either due to an actual text change or due to a shift in text caused by insertion of text, then the revision number of that page has been changed in the upper right hand corner. The location of text changes is noted by a side bar in the right hand margin.

## RECEIPT ACKNOWLEDGMENT

**LICENSE APPLICATION, AMENDMENT 9 (FEBRUARY 2, 2000)**  
**PRIVATE FUEL STORAGE FACILITY**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE L.L.C**

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**PRIVATE FUEL STORAGE FACILITY  
SAFETY ANALYSIS REPORT**

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Table 4.2-7	9
Table 4.2-8	9
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Figure 4.2-7	8
Figure 4.2-8	0
Figure 4.3-1	9
Figure 4.5-1	0
Figure 4.5-2	0

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Figure 4.5-4	2
Figure 4.5-5	2
Figure 4.5-6 (1 of 4)	3
Figure 4.5-6 (2 of 4)	3
Figure 4.5-6 (3 of 4)	3
Figure 4.5-6 (4 of 4)	3
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Figure 4.7-6	3
Figure 4.7-7	6
Figure 4.7-8	9

Chapter 5 Tab

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5.2-6	7
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Table 5.1-1 (2 of 2)	6
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Figure 5.1-3	0
Figure 5.1-4	0
Figure 5.1-5	0
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Figure 7.3-2	0
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Table 8.1-1	9
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Figure 9.1-2	4
Figure 9.1-3	4
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