



*Private Fuel Storage, L.L.C.*

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U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555-0001

April 14, 2000

**SUBMITTAL OF REVISED COST-BENEFIT ANALYSIS**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

- References:
1. April 10, 2000 telephone call between Private Fuel Storage, Stone and Webster, and the NRC
  2. PFS letter, Donnell to U.S. NRC, EIS Commitment Resolution Letter #2, dated November 19, 1999
  3. Shaw Pittman Potts & Trowbridge letter, Gaukler to Delligatti, Transmittal of Proprietary ER References, dated December 18, 1998

As discussed in the above referenced telephone call (Reference 1) Private Fuel Storage (PFS) has revised the cost-benefit analysis previously submitted with References 2 and 3. The revised cost-benefit analysis entitled "Utility At-Reactor Spent Fuel Storage Costs For The Private Fuel Storage Facility Cost-Benefit Analysis, Revision 2", ERI-2025-0001 dated April 2000, is enclosed.

The analysis contained in the 1999 ERI Report (Reference 2) did not attempt to determine the optimal method for spent fuel acceptance for shipping spent fuel to the PFSF from individual reactors. Instead, the 1999 ERI Report used an "oldest fuel first" (OFF) acceptance priority for shipment to the PFSF. This acceptance methodology provided an overly conservative estimate of at-reactor spent fuel storage costs and did not necessarily reflect how the users of the PFSF would want their spent fuel shipments to be prioritized.

The users of the PFSF will benefit the most from an acceptance schedule that: 1) limits the amount of additional dry storage that must be added at reactor sites and 2) reduces the time spent fuel remains on site following reactor shutdown for decommissioning.

The analysis described in ERI-2025-0001 uses an optimized spent fuel acceptance schedule for shipments to the PFSF to accomplish these two goals. The only difference in this analysis from the analysis contained in the 1999 ERI Report is the order in which

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spent nuclear fuel is shipped from individual reactor sites to the PFSF. This in turn results in lower amounts of dry storage at sites, fewer (or no) sites adding dry storage after the PFSF begins operation and shorter post-shutdown storage periods.

The postulated optimized shipping schedules developed by ERI considered utility needs for removal of spent fuel from reactor sites to realize the above benefits. ERI believes that these optimized schedules provide a realistic assessment of how the PFSF might operate to meet its customers' needs. The OFF analyses provided in earlier ERI analyses can be viewed as a bounding analysis associated with a less-than-optimized schedule.

A set of 3.5 inch diskettes (3 disks) containing non-proprietary spreadsheets used to calculate the additional loading costs for shipment of spent fuel offsite is also enclosed for your use. A CD-ROM containing proprietary spreadsheets used in the ERI analysis is being transmitted separately.

If you have any questions regarding this submittal, please contact me at 303-741-7009.

Sincerely



John L. Donnell  
Project Director  
Private Fuel Storage L.L.C.

Enclosure

Copy to:

Mark Delligatti – 1/0  
Scott Flanders – 1/1 (includes 1 set of disks)  
John Parkyn – 1/0  
Jay Silberg – 1/1  
Sherwin Turk – 1/0  
Greg Zimmerman – 1/1  
Scott Northard – 1/0  
Denise Chancellor – 1/1  
Richard E. Condit – 1/0  
John Paul Kennedy – 1/0  
Joro Walker – 1/0