



Private Fuel Storage, L.L.C.

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**RESPONSES TO THIRD ROUND EIS
REQUEST FOR ADDITIONAL INFORMATION
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.**

- References:
1. NRC Letter, Delligatti to Parkyn, Request for Additional Information for the Environmental Impact Statement, dated October 24, 2000
 2. November 6, 2000 teleconference between S&W and the NRC
 3. November 7, 2000 teleconference between S&W, PFS, and the NRC/ORNL

Reference 1 submitted the NRC's Third Round Environmental Impact Statement (EIS) Request for Additional Information. Please find enclosed PFS's responses to question nos. 2, 3, 4 and 8 of Reference 1. The responses to question nos. 1, 5, 6, and 7 will be submitted under separate cover, as described below:

Question 1

As discussed in the Reference 2 teleconference, the response to question no. 1 will include information on the remaining fuel assembly storage capacity and projected date of loss of full-core offload capability for all the reactors listed in Table 1.1 of the NRC's Draft EIS, in addition to information resulting from changes in the PFS membership. This information will be submitted by November 15, 2000.

Question 5

In the Reference 3 teleconference, the NRC was informed that the cost-benefit analyses currently being developed in response to question no. 5 assume that spent fuel is received at the PFSF subsequent to 20 years of facility operation. The results of these analyses will be submitted to the NRC by November 15, 2000. In addition, the NRC requested that separate analyses be developed for the response to question no. 5 which are based on the assumption that no fuel is

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received at the PFSF subsequent to 20 years of facility operation. The results of this second set of analyses for question no. 5 will be submitted to the NRC by December 5, 2000.

Question 6

The NRC also indicated (Reference 3 teleconference) that the cost-benefit analyses that estimate the "break-even" capacity, addressed in question no. 6, should be based on the assumption that no fuel is received at the PFSF subsequent to 20 years of facility operation. The response to question no. 6 will be submitted to the NRC by December 5, 2000.

Question 7

As discussed in the Reference 2 teleconference regarding the response to question no. 7, if PFS has a substantive basis to support its assumption of a "30% discount" price of the storage system to be used at the PFSF, then performance of new cost-benefit analyses that show costs and benefits with and without credit for this discount need not be performed. PFS should consider in its response to question no. 7 the possibility of utilities purchasing storage systems in bulk quantities in order to obtain discounted prices similar to those considered for the PFSF. The response to question no. 7 will be submitted by November 15, 2000, providing the basis for the assumed "30% discount" price of storage systems.

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 (with enclosure):

Mark Delligatti
Scott Flanders
John Parkyn
Jay Silberg
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**ENCLOSURE CONTAINING RESPONSES TO
QUESTION Nos. 2, 3, 4 and 8 of the NRC's THIRD ROUND
EIS REQUEST FOR ADDITIONAL INFORMATION**

ENVIRONMENTAL IMPACT STATEMENT

2. Provide the capacity (i.e., on-pad storage in MTU) of the proposed Private Fuel Storage Facility (PFSF) if only spent nuclear fuel from member utilities were to be accepted.
 - This information is requested as a result of changes in the Private Fuel Storage L.L.C. (PFS) membership.

RESPONSE

PFS membership has changed to include Florida Power and Light Company's St. Lucie and Turkey Point nuclear power plants. Since the Clinton and Oyster Creek nuclear power plants have been sold to AmerGen, these reactors are no longer part of the "members only" analysis. TMI was not previously included in the members only analysis.

The required capacity of the PFSF is estimated to be approximately 8,800 MTU for the 2015 repository case and 7,400 MTU for the 2010 repository case. These capacities are based on the assumption that the initial 20 year PFSF license is renewed, and spent fuel shipments are received at the PFSF subsequent to 20 years of operation. Please note that the on-pad capacity will change depending upon the assumed annual shipments to the PFSF and the estimated shipments from PFSF to the Department of Energy (DOE) repository. Thus, these capacities should be viewed as estimates.

ACTION

This information will be reflected in Chapter 7 of the PFSF ER.

3. Provide the status of the wetlands delineation along the proposed rail corridor and state whether a Section 404 permit will be required. Also, provide any updated information on the status of required permits and approvals
 - This information is required to update DEIS Section 1.6.

RESPONSE

A surveillance of the 32-mile proposed rail corridor (i.e., Low Corridor) was undertaken in October 2000 to determine whether a jurisdictional stream or wetland would be crossed and would require a Clean Water Act (CWA) Section 404 Army Corps of Engineers (COE) Permit and a Utah State 401 water quality certification.

Initial conclusions associated with the recent surveillance of the proposed rail corridor confirmed that no playa wetlands, other isolated wetlands, perennial or seasonal streams would be crossed by the proposed rail spur. Two channels along the 32-mile

corridor that could be considered as ephemeral are still under evaluation. Should these channels be determined to be ephemeral, they may be considered jurisdictional and require a COE permit and a Utah State 401 water quality certification. Should a COE permit be required, it may be possible to construct the rail spur under one of the 404 program nationwide permits. These matters will be discussed with the COE, as appropriate.

With the exception of the Low Corridor surveillance, all other information presented in Chapter 9 of the Environmental Report, Revision 12, is still current.

ACTION

Chapter 9 of the Environmental Report will be updated, as necessary, to reflect the determination as to whether any channels are considered as ephemeral and require a COE permit and a Utah State 401 water quality certification.

4. Explain the PFS policy on using on-site fire fighting capability to assist with the fighting of wildfires not directly on the site but in Skull Valley (or elsewhere in Tooele County).
 - This information is needed to clarify whether such activities would ever negatively impact PFS's on-site fire fighting capabilities.

RESPONSE

It is not PFS's intent to use on-site fire fighting capability to assist with the fighting of wildfires not on the PFSF site. Moreover, as concluded in PFSF SAR Section 8.2.5, a wildfire adjacent to the PFSF does not pose a threat of damage to important to safety structures, systems, and components, including spent fuel casks, and there would be no release of radioactivity in the event of a wildfire, even with no credit for fire fighting. In addition, Section 8.2.5 of the SAR concludes that a wildfire in the vicinity of the PFSF would not cause evacuation of PFSF security personnel. By virtue of the 300 ft crested wheat grass barrier surrounding the PFSF RA and the distance between the outer edge of the perimeter road around the RA, the heat from a wildfire would not pose a threat to any personnel inside the RA. PFSF security personnel will have appropriate emergency breathing apparatus available such that the smoke from a wildfire near the PFSF will not force them to evacuate. Thus, the PFSF fire brigade is not relied upon to protect the facility from wildfires.

ACTION

No action is required.

8. Confirm whether the \$200 million “accident” insurance cost has been included in the previous cost-benefit calculation.

- This information was not previously provided.

RESPONSE

The cost of purchasing the \$200 million third party liability (“accident”) insurance has been included in the previous cost-benefit calculation.

ACTION

No action is required.