

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

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*John L. Donnell, P.E., Project Director*

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

October 13, 1999

**COMMITMENT RESOLUTION LETTER #18**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

In accordance with our October 7, 1999 conference call, Private Fuel Storage (PFS) submits the following resolution to NRC/CNWRA questions and comments regarding the aircraft crash hazard assessment for the Private Fuel Storage Facility (PFSF).

**NRC Questions and Comments**

1. The NRC raised questions about PFS's use of "normal" rather than "special operations" aircraft crash rates from DOE-STD 3014-96 for the F-16s flying down Skull Valley and requested further justification from PFS for its use of the normal crash rate.
2. The NRC questioned PFS's approach of using a time-weighted average area for the cask storage area when calculating the air crash impact hazard to the PFSF instead of evaluating the hazard on an annual basis.
3. The NRC questioned why PFS analyzed the air crash impact hazards for the cask storage area and the canister transfer building independently and requested PFS to provide further justification for such independent treatment or for PFS to alternatively treat the cask storage area and the canister transfer building together.
4. In light of the above questions, the NRC also questioned the overall likelihood of an aircraft crash impacting the PFSF, and the NRC requested PFS, should it be unable to show the lack of any credible hazard from aircraft crashes, to identify the type and quantity of live ordnance carried by F-16s flying down Skull Valley and assess the potential consequences of an F-16 carrying live ordnance crashing at or nearby the PFSF. Also, to further support the Air Force's statement of no inadvertent release of ordnance, the NRC requested PFS to show, if possible, how many flights on the UTTR have taken place without an inadvertent release of ordnance.

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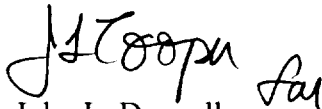
5. The NRC raised questions about the speeds at which crashing aircraft would impact the spent fuel storage casks and requested PFS to clarify and further address, if possible, this issue.

**PFS Response**

PFS is currently reviewing the foregoing items and will provide an additional letter responding to the NRC's questions and comments on October 22, 1999. PFS submitted Freedom of Information Act Requests to the U.S. Air Force on Friday October 8, 1999, requesting certain information to be used in preparing the responses. It is possible that PFS may not receive this information in time to be included in its October 22, 1999 response. In such an event, PFS would supplement its October 22, 1999 response as necessary upon receipt of the information from the U.S. Air Force.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "JL Donnell", followed by a small flourish.

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

Copy to: Mark Delligatti  
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