

*Private Fuel Storage, LLC*

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

*John D. Parkyn, Chairman of the Board*

August 24, 1999

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

**REQUEST FOR EXEMPTION TO 10 CFR 72.102(f)(1)  
SEISMIC DESIGN REQUIREMENT  
DOCKET NO. 72-22/TAC NO. L22462  
PRIVATE FUEL STORAGE FACILITY  
PRIVATE FUEL STORAGE L.L.C.**

Reference 1: PFS letter, J. Parkyn to M. Delligatti, Request for Exemption to 10 CFR 72.102(f)(1), dated April 2, 1999

Reference 2: PFS letter J. Donnell to U.S. NRC Document Control Desk, Commitment Resolution Letter #14, dated August 6, 1999

In Reference 1, Private Fuel Storage L.L.C. (PFS) submitted an exemption request to change the methodology for calculating the design earthquake for the Private Fuel Storage Facility (PFSF) from a deterministic approach to a probabilistic, risk-informed approach. The exemption request provided justification for this approach, and stated that the design basis ground motion at the PFSF site would be based on a 1,000 year recurrence interval. Based on recent discussions with the NRC, PFS has decided to use a 2,000 year recurrence interval to calculate the PFSF design basis ground motion (Reference 2). This will provide a greater margin of safety than the 1,000 year recurrence interval specified in Reference 1. PFS requests that the NRC continue to review and evaluate its Reference 1 exemption request, based on a revised design basis ground motion with a 2,000 year recurrence interval. As shown in Table 1 of the report attached to Reference 1 prepared by Geomatrix Consultants, Inc., this results in peak ground accelerations of 0.53g horizontal (two directions) and 0.53g vertical. PFSF License Application amendment #5, scheduled for issuance on August 27, 1999, will incorporate this change to the PFSF design basis.

1/0  
Nick

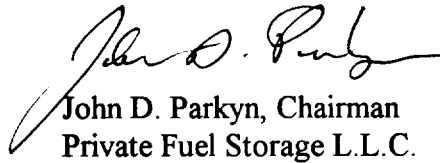
260023

9908260124 990824  
PDR ADDCK 07200022  
C PDR

August 24, 1999

Should you have any questions concerning this letter, please contact me at 608-787-1236 or our project director, Mr. John Donnell, at 303-741-7009.

Sincerely,



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

cc: John Donnell  
Jay Silberg  
Sherwin Turk  
Asadul Chowdhury  
Murray Wade  
Scott Northard  
Denise Chancellor  
Richard E. Condit  
John Paul Kennedy  
Joro Walker