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August 3, 2015

Mr. Mark Lombard
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards

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

Subject: Notice of Intent to License the ELEA Interim Storage facility and Request to
Establish a New Part 72 Docket

Reference: Holtec Project number: H-5025
Project Name: ELEA Consolidated Interim Storage Facility

Dear Director Lombard:

We request the NRC to open a part 72 docket to serve as the repository of information on our planned licensing interactions with SFST to establish a Consolidated Interim Storage (CIS) facility on an undeveloped and isolated patch of land in Southeast New Mexico owned by the Eddy-Lea Alliance (ELEA). The proposed away-from reactor (AFR) installation is envisaged to fulfill our national aspiration for an interim storage facility for used nuclear fuel as articulated in the Blue Ribbon Commission's report which was subsequently adopted by the DOE. We are pleased to observe that the prerequisites for a consent-based facility envisioned by the DOE are fully met by the proposed ELEA facility which enjoys overwhelming support of the local community and a strong endorsement of the State's Governor.

We expect the site, which is quite remote (35 miles from the nearest population center) and well investigated (the WIPP facility is only about 12 miles away) to muster environmental qualification without any difficulty.

Holtec International plans to deploy its state-of-the-art HI-STORM UMAX system (docket # 72-1040), which stores fuel safely in a subterranean configuration, and has thus far been adopted by Callaway and SONGS, as well as an earlier low heat load version currently in use at Humboldt Bay. As stated in its FSAR, the HI-STORM UMAX system has been engineered to store the entire complement of canisters currently deployed at ISFSIs around the country. All present Holtec client plants will, of course, become eligible to ship their fuel to ELEA, as will a

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prospective client such as Wolf Creek, which can avail itself of the ELEA AFR without having to establish an onsite ISFSI. To serve our existing client with a multi-canister ISFSI, namely SONGS, we plan to expand the contents list of HI-STORM UMAX by incorporating the NUHOMS canisters stored at that site. Thus, we propose a LAR submitted on the HI-STORM UMAX docket that will seek to add SONGS NUHOMS DSCs to the list of approved contents for the HI-STORM UMAX canister storage system. Additionally, we will expand the HI-STORM UMAX contents to include all Holtec canisters, and all canisters from shutdown plants and near term shutdown plants (Connecticut Yankee, Humboldt Bay, Kewaunee, La Crosse, Maine Yankee, Millstone Unit 1, Oyster Creek, Rancho Seco, Trojan, Yankee Rowe, Zion). Further expansion of cask contents in HI-STORM UMAX to include all other canisters deployed at presently operating ISFSIs in the country will be undertaken at a later date in a subsequent submittal of the HI-STORM UMAX licensing application.

The ELEA site specific licensing application will invoke the HI-STORM UMAX FSAR by reference. The work on the site specific licensing application for ELEA is proceeding apace suitably informed by the experience gained in our prior similar work over a decade ago on behalf of Private Fuel Storage, LLC for the Skull Valley, Utah site.

We trust that the low seismicity, the stable desert plateau geology combined with the vanishing small radiation dose and robust missile resistance characteristics of the HI-STORM UMAX system will help make NRC's safety evaluation effort for our New Mexico facility amenable to an expedited and predictable licensing outcome.

Consistent with its mission to serve as a staging venue for the all-welded canisters, the proposed ELEA AFR is being engineered to facilitate convenient and low dose removal of the canisters for their eventual transport to the ultimate repository. Holtec plans to request a 40 year license life for the ELEA facility at this time which, in our considered estimate, is a small fraction of the expected useful service life of the canisters.

A definitive submittal schedule will be finalized after the pre-submittal meeting with SFST, which our Licensing Manager will shortly request from your office to be scheduled at your convenience before the Thanksgiving holiday.

We appreciate your kind consideration of our request to open the docket with Holtec International as the designated licensee of record.

Sincerely,



Stefan Anton
Vice President of Engineering,
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