



AMERICA'S NUCLEAR SOLUTION

WCS-CISF-16-001

October 7, 2016

Mr. Mark Lombard, Director
U.S. Nuclear Regulatory Commission
Division of Spent Fuel Management
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

- References:
- (1) Letter from J. Scott Kirk (WCS) to Mark Lombard (NRC), License Application to Construct and Operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas, Docket 72-1050, dated April 28, 2016
 - (2) Letter from Mark Lombard (NRC) to Scott Kirk (WCS), Acceptance Review of Specific License Application Requesting Authorization to Construct and Operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel – Supplemental Information Needed, dated June 22, 2016
 - (3) Letter from J. Scott Kirk (WCS) to Mark Lombard (NRC), Supplemental Information to Support the License Application for an Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas, Docket 72-1050, dated July 6, 2016

Subject: Supplemental Information to Support a License Application for a Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas, Docket 72-1050

Dear Mr. Lombard:

Waste Control Specialists LLC (WCS) hereby files supplemental information requested by the NRC staff on June 22, 2016 (Reference 2) to support continued NRC review of the April 28, 2016 WCS License application requesting authorization to construct and operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas (Reference 1). WCS is providing responses to Request for Supplemental Information (RSI) items in accordance with the RSI Response Schedule attached to our letter to you dated July 6, 2016 (Reference 3).

Corporate
5430 LBJ Freeway, Ste. 1700
Three Lincoln Centre
Dallas, TX 75240
Ph. 972.715.9800
Fx. 972.448.1419

Facility
P.O. Box 1129
Andrews, TX 79714
Ph. 888.789.2783
Fx. 432-525-8902

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Based on recent discussions with NRC staff on September 29, 2016, this submittal has been slightly delayed to assess the feedback we received during that meeting and incorporate changes in our responses where appropriate.

The schedule has been updated and reformatted to show our plans for future submittals, including indication of certain RSI responses which will be revised and resubmitted. The schedule is included herein as Enclosure 1. Responses to certain of the observations are included in this submittal as well.

This submittal contains the following enclosures:

- Enclosure 1 provides an updated WCS RSI response schedule.
- Enclosure 2 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that the proprietary information included in Enclosure 3 and Enclosure 8 of this submittal be withheld from public disclosure. That information may not be used for any purpose other than to support the review of the WCS application. A non-proprietary version of Enclosure 3 is provided in Enclosure 6. Since Enclosure 8 is entirely proprietary, there is no corresponding non-proprietary version.
- Enclosure 3 provides responses to the RSI/observation items. This enclosure is partially proprietary.
- Enclosure 4 provides a list of changed WCS application and SAR parts and indication of the associated RSI(s)/observation(s).
- Enclosure 5 provides changed pages for affected parts of the application and the SAR.
- Enclosure 6 provides a public version of the Enclosure 3 RSI/observation responses.
- Enclosure 7 is not used.
- Enclosure 8 provides portions of a procedure associated with proprietary RSI 10.1. Enclosure 8 is entirely proprietary.

Application, SAR, and procedure changes are tracked and indicated by revision bars and italics for newly inserted text. All changes from previous RSI response submittals are tracked. The new changes, associated with the RSI/observation responses herein, are further annotated with rectangles enclosing the changed areas and RSI/observation numbering indications as to which RSI/observation is related to the changes.

All application and SAR pages are shown as "Interim Rev. 1." WCS will prepare a consolidated updated revision to the application, the SAR, the Environmental Report, etc. containing all of these pages, to be included with the final RSI response submittal in the near future.

This submittal is being provided as an electronic submission, using the optical storage media (OSM) provision from Section 4 of the NRC Guidance for Electronic Submissions to the NRC. Accordingly, we have included a Document Components listing and OSM#1 and OSM#2 listings at the end of this cover letter.

WCS has completed and submitted ahead of schedule all outstanding responses to the RSIs pertaining to the Physical Security Plan under separate cover, as those responses contain

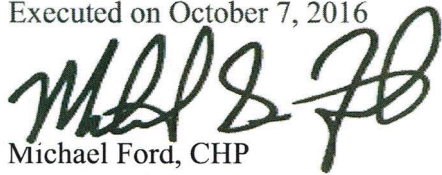
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Safeguards Information and must be controlled in accordance with the requirements specified in 10 CFR 73.22.

WCS requests that a copy of all correspondence regarding this matter be emailed to my attention (mford@valhi.net) as soon as possible after issuance. If you have any questions or need additional information, please call me at your earliest convenience at 972-450-4284.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on October 7, 2016



Michael Ford, CHP
Vice President, Licensing & Corporate Compliance

Cc:

John-Chau Nguyen, NRC (one hardcopy of this cover letter; five copies of the OSM#1 disk and one copy of the OSM#2 disk)

Cover letter only:

Elicia Sanchez, WCS
Jay Britten, WCS
Jay Cartwright, WCS
Jeremy Vesely, WCS

One copy of the OSM#1 disk, which contains the entire submittal, to the following:

Mike Lynch, AREVA
Kent Cole, NAC International
WCS Regulatory Compliance
WCS Records Management

Enclosures:

1. Waste Control Specialists LLC RSI Response Schedule
2. Waste Control Specialists LLC Affidavit dated 23 SEP 2016
3. RSIs/Observations and Responses (proprietary version)
4. List of Changed WCS CISF Application and SAR Parts and Associated RSIs/Observations
5. Changed WCS CISF Application and SAR Pages, Interim Revision 1
6. RSIs/Observations and Responses (public version)
7. Not used
8. Portions of Procedure QP-10.02, Associated with Proprietary RSI 10.1 (proprietary)

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Document Components:

001 Public WCS Transmittal Letter.pdf, 2,703,613 bytes
002 Public Enc 1 WCS RSI Schedule.pdf, 83,703 bytes
003 Public Enc 2 Affidavit.pdf, 990,376 bytes
004 SUNSI Enc 3 RSI-Obs and Resp - Prop.pdf, 100,265 bytes, Proprietary
005 Public Enc 4 List of Changed Parts.pdf, 69,766 bytes
006 Public Enc 5 Changed Pages.pdf, 12,997,589 bytes
007 Public Enc 6 RSI-Obs and Resp - Public.pdf, 118,562 bytes
008 SUNSI Enc 8 Portions of QP-10.02 - Prop.pdf, 396,113 bytes, Proprietary

OSM#1 (Entire Submittal) (DVD):

001 Public WCS Transmittal Letter.pdf, 2,703,613 bytes
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007 Public Enc 6 RSI-Obs and Resp - Public.pdf, 118,562 bytes
008 SUNSI Enc 8 Portions of QP-10.02 - Prop.pdf, 396,113 bytes, Proprietary

OSM#2 (Public Information Only) (DVD):

001 Public WCS Transmittal Letter.pdf, 2,703,613 bytes
002 Public Enc 1 WCS RSI Schedule.pdf, 83,703 bytes
003 Public Enc 2 Affidavit.pdf, 990,376 bytes
005 Public Enc 4 List of Changed Parts.pdf, 69,766 bytes
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