

~~Safeguards Information~~



INTERIM STORAGE PARTNERS

September 18, 2019
E-55056

Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Completed Response to RAI Part 1, Physical Security, including Revision 5 of the Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002

- Reference:**
1. Letter from John-Chau Nguyen (NRC) to Elicia Sanchez (ISP), Interim Storage Partners' License Application to Construct and Operate the Waste Control Specialists Consolidated Interim Storage Facility, Andrews County, Texas, Docket No. 72-1050 – First Request for Additional Information Part 1, Physical Security, dated November 6, 2018
 2. Letter from Elicia B. Sanchez (ISP) to Document Control Desk (NRC), Partial Response to RAI Part 1, Physical Security, including Revision 3 of the Physical Security Plan, Guard Training and Qualification Plan, Docket 72-1050, E-53364, dated January 7, 2019
 3. Letter from Elicia B. Sanchez (ISP) to Document Control Desk (NRC), Partial Response to RAI Part 1, Physical Security, including Revision 3 of the Physical Security Plan, Guard Training and Qualification Plan, Docket 72-1050, E-54576, dated June 26, 2019
 4. Letter from Jack Boshoven (ISP) to Document Control Desk (NRC), Interim Storage Partners (ISP) First Request for Additional Information (RAI) Proposed Submittal Schedule, Docket 72-1050 CAC/EPID 001028/L-2017-NEW-0002, E-54395, dated May 31, 2019

~~Safeguards Information~~

When separated from ~~Safeguards Information~~ enclosure(s), this document is decontrolled provided the transmittal document does not otherwise warrant protection from the unauthorized disclosure.

P.O. Box 1129 • Andrews, Texas 79714 • interimstoragepartners.com

S001
NM5520
NM5526
NM55

ML19270E399

Interim Storage Partners LLC (ISP) hereby submits its RAI responses for Physical Security RAIs RAI-9, -10, -11, -12, -13, -14, -16, -19, -22, -23, and -26 and the 2019 WCS CISF Blast Analysis supporting these responses. In addition ISP also submits revised or supplemented responses to Physical Security RAIs RAI-4, -5, -6, -8 and -27.

ISP provided a partial response to the Request for Additional Information (RAI) Part 1, Physical Security documented in the attachments to the NRC letter dated November 6, 2018 (Reference 1) on January 7, 2019 (Reference 2). The reference 2 submittal provided responses to seventeen (17) of the twenty-eight (28) RAIs attached to Reference 1. On June 26, 2019, ISP (Reference 3) provided draft responses to the remaining eleven (11) RAIs, draft revised or supplemented responses to RAIs RAI-6 and -8, along revision 4 of the Physical Security Plan, Training & Qualification Plan, Safeguards Contingency Plan and draft 2019 WCS CISF Blast Analysis.

This submittal incorporates the changes based on the discussions ISP has had with NRC staff regarding the previous draft submittals. This submittal is consistent with the schedule identified in Table 3 of Reference [4].

The following enclosures are being submitted:

- Enclosure 1 Contains the RAI Responses dated September 18, 2019 (SGI)
- Enclosure 2 is a copy of the Consolidated Interim Storage Facility Physical Security Plan, PSP-100, Revision 5 (SGI)
- Enclosure 3 is a copy of the Consolidated Interim Storage Facility Security Training and Qualification Plan, TQP-700, Revision 5 (SGI)
- Enclosure 4 is a copy of the Consolidated Interim Storage Facility Safeguards Contingency Plan, SCP-300, Revision 5 (SGI)
- Enclosure 5 is a copy of updated 2019 CISF Blast Analysis, Dated August 8, 2019 (SGI)
- Enclosure 6 includes copies of the MOUs (Change Pages to the Consolidated Emergency Response Plan) that were revised as described in the RAI responses (Public).
- Enclosure 7 is a full size print out of PSP Attachment 10.1 Drawing (SRI)

Enclosures 1 through 5 are marked as Safeguards Information and must be withheld from unauthorized disclosure pursuant to 10 CFR 73.22. Enclosure 7 contains a full size PDF copy of attachment 10.1 and is not designated as SGI when separated from the PSP; however it contains Security Related Information and should be appropriately controlled.

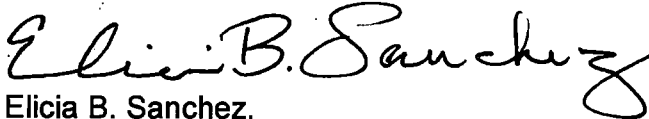
~~Safeguards Information~~

When separated from ~~Safeguards Information~~ enclosure(s), this document is decontrolled provided the transmittal document does not otherwise warrant protection from the unauthorized disclosure.

ISP requests that a copy of all correspondence regarding this matter be directly mailed to Ms. Elicia B. Sanchez, at 9998 Highway 176, Andrews, TX 79714.

Should you have any questions regarding this submittal, please contact Mr. Jack Boshoven by telephone at (410) 910-6955, or by email at jack.boshoven@orano.group.

Sincerely,



Elicia B. Sanchez,
Chief Financial Officer
Interim Storage Partners LLC

cc: John (Chau) Nguyen (NRC SFM) – Letter Only
Jeff Isakson, ISP/TN Americas – Letter Only
Jack Boshoven, ISP/TN Americas – Letter Only

Enclosures:

1. RAI Responses dated September 18, 2019 (SGI)
2. Consolidated Interim Storage Facility Physical Security Plan, PSP-100, Revision 5 (SGI)
3. Consolidated Interim Storage Facility Security Training and Qualification Plan, TQP-700, Revision 5 (SGI)
4. Consolidated Interim Storage Facility Safeguards Contingency Plan, SCP-300, Revision 5 (SGI)
5. 2019 CISF Blast Analysis, Dated August 8, 2019 (SGI)
6. Memorandums of Understanding (MOUs) (Public)
 - a. Andrews County Sheriff's Office
 - b. The Eunice New Mexico Police Department
7. Full size PSP Attachment 10.1 Drawing (SRI)


~~Safeguards Information~~

When separated from ~~Safeguards Information~~ enclosure(s), this document is decontrolled provided the transmittal document does not otherwise warrant protection from the unauthorized disclosure.

Enclosure 6 to E-55056

Memorandums of Understanding

- a. Andrews County Sheriff's Office**
- b. The Eunice New Mexico Police
Department**

	Emergency Procedures	Effective Date	ERP-100
	Consolidated Emergency Response Plan	Revision 09-18-2019	Page 70 of 83

**MEMORANDUM OF UNDERSTANDING
BETWEEN**


THE ANDREWS COUNTY SHERIFF'S OFFICE AND WASTE CONTROL SPECIALISTS LLC AND INTERIM STORAGE PARTNERS LLC

The purpose of this Memorandum of Understanding is to provide for the cooperation and coordination between the Andrews County Sheriff's Office and Waste Control Specialists LLC (WCS) and Interim Storage Partners LLC (ISP).

WCS operates a fully permitted and licensed hazardous and low level radioactive waste treatment, storage and disposal facility. ISP operates a licensed Consolidated Interim Storage Facility (WCS CISF) for Spent Nuclear Fuel. In the event of an emergency, and the potential need for services, the Andrews County Sheriff's Office will respond to the facility and provide Primary Law Enforcement Services should they be needed at the facility.

Therefore, during the construction, operations and decommissioning of the WCS waste treatment, storage and disposal facilities and the WCS CISF in Andrews County, the following is agreed to:


1. The Andrews County Sheriff's Office will provide support through immediate law enforcement deployment as may be required to address WCS/WCS CISF site protection and enforcement of applicable laws in emergencies at or near the WCS/WCS CISF site. Additionally, the Andrews County Sheriff's Office commits to the deployment of additional staff after verification of need.
2. In the event of an emergency at the facility, the Andrews County Sheriff's Office will coordinate with WCS/ISP under a consolidated emergency response plan to establish law enforcement, investigative, traffic control and evacuation services should they be needed at the facility. When present on-scene, the Andrews County Sheriff's Office will coordinate the local police response as the Primary Emergency Authority for Local Law Enforcement.
3. The Andrews County Sheriff's Office will ensure Sheriff's responders dispatched for support will arrive with necessary equipment and identification for site access and emergency response. All Andrews County Sheriff's Office equipment, property and personnel will remain under the operational control of their respective agency.
4. The Andrews County Sheriff's Office will ensure that responding personnel from the Sheriff's Office would serve as arresting authority and provide take-back services, when needed.
5. The Andrews County Sheriff's Office agrees that if a security situation is critical to classified waste or information it will arrange for additional law enforcement assistance. The response time of additional support will vary.
6. The Andrews County Sheriff's Office agrees that they will provide long-term support beyond the event itself and arrest of individuals detained in the event, as needed.
7. This agreement will be reviewed every five years or when a change in the office holder occurs.
8. See Attachment A of the Integrated Response and Recovery Plan (IRRP) for and addendum to this MOU reflecting additional responsibilities.

	Emergency Procedures	Effective Date	ERP-100
	Consolidated Emergency Response Plan	Revision 09-18-2019	Page 71 of 83

In witness whereof, the parties have executed this Memorandum of Understanding on the date indicated.

_____ Name (print)	_____ Name (print)	_____ Name (print)
_____ Signature	_____ Signature	_____ Signature
_____ Title	_____ Title	_____ Title
Waste Control Specialists LLC	Interim Storage Partners LLC	Andrews County Sheriff's Office
Date: _____	Date: _____	Date: _____

DRAFT

 WASTE CONTROL SPECIALISTS	Emergency Procedures	Effective Date	ERP-100
	Consolidated Emergency Response Plan	Revision 09-18-2019	Page 78 of 83

MEMORANDUM OF UNDERSTANDING

BETWEEN

THE EUNICE NM POLICE DEPARTMENT AND WASTE CONTROL SPECIALISTS LLC AND INTERIM STORAGE PARTNERS LLC


The purpose of this Memorandum of Understanding is to provide for the cooperation and coordination between the Eunice Police Department and Waste Control Specialists LLC (WCS) and Interim Storage Partners LLC (ISP).

WCS operates a fully permitted and licensed hazardous and low level radioactive waste treatment, storage and disposal facility. ISP operates a licensed Consolidated Interim Storage Facility for Spent Nuclear Fuel. In the event of an emergency, and the potential need for services, the Eunice Police Department will respond to the facility and provide law enforcement services should they be needed at the facility.

Therefore, during the construction, operations and decommissioning of the WCS waste treatment, storage and disposal facilities and WCS CISF in Andrews County, the following is agreed to:

1. The Eunice Police Department will provide support through immediate law enforcement deployment as may be required to address WCS/WCS CISF site protection and enforcement of applicable laws in emergencies at or near the WCS/WCS CISF site. Additionally, the Eunice Police Department commits to the deployment of additional staff after verification of need.
2. In the event of an emergency at the facility, the Eunice Police Department will coordinate with WCS/ISP under a consolidated emergency plan to establish law enforcement, investigative, traffic control and evacuation services should they be needed at the facility. Once present on-scene, the Andrews County Sheriff's Office will coordinate the local police response as the Primary Emergency Authority for Local Law Enforcement.
3. The Eunice Police Department will ensure their responders dispatched for support will arrive with necessary equipment and identification for site access and emergency response. All Eunice Police Department equipment, property and personnel will remain under the operational control of their respective agency.
4. The Eunice Police Department will ensure that responding personnel dispatched by Eunice Police Department would serve as an authority to detain adversaries until Texas law enforcement arrives.
5. The Eunice Police Department agrees that if a security situation is critical to classified waste or information it will arrange for additional law enforcement assistance. The response time of additional support will vary.
6. The Eunice Police Department agrees that they will provide long-term support beyond the event itself and arrest of individuals detained in the event, as needed.
7. This agreement will be reviewed every five years or when a change in the office holder occurs.
8. See Attachment B of the Integrated Response and Recovery Plan (IRRP) for and addendum to this MOU reflecting additional responsibilities.

DRAFT

 WASTE CONTROL SPECIALISTS	Emergency Procedures	Effective Date	ERP-100
	Consolidated Emergency Response Plan	Revision 09-18-2019	Page 79 of 83

In witness whereof, the parties have executed this Memorandum of Understanding on the date indicated.

_____ Name (print)	_____ Name (print)	_____ Name (print)
_____ Signature	_____ Signature	_____ Signature
_____ Title	_____ Title	_____ Title
Waste Control Specialists LLC	Interim Storage Partners LLC	Eunice Police Department
Date: _____	Date: _____	Date: _____

DRAFT