



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

October 10, 2019

MEMORANDUM TO: Christopher M. Regan, Deputy Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Chris Allen, Project Manager **/RA/**
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF SEPTEMBER 12, 2019, PUBLIC MEETING TO
DISCUSS INTERIM STORAGE PARTNERS DRAFT RESPONSES TO
REQUESTS FOR ADDITIONAL INFORMATION, DATED JULY 26, 2019,
ISSUED IN CONNECTION WITH NRC REVIEW OF THE INTERIM
STORAGE PARTNERS CONSOLIDATED INTERIM STORAGE
FACILITY APPLICATION FOR A FACILITY AT ANDREWS COUNTY,
TEXAS

PURPOSE:

For the Nuclear Regulatory Commission (NRC) staff and representatives from Interim Storage Partners (ISP) to discuss ISP's draft responses to requests for additional information (RAIs) dated November 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18320A184), issued in connection with its review of the license application for the proposed ISP Consolidated Interim Storage Facility. The meeting was noticed on August 27, 2019 (ADAMS Accession No. ML19239A201).

MEETING SUMMARY

On September 12, 2019, NRC staff held a partially closed Category 1 public meeting with representatives from ISP at the NRC's Two White Flint North Building in Rockville, Maryland. Attendees included ISP and its contractors, NRC staff, and members of the public. The discussion followed the agenda provided in Enclosure 2. NRC and ISP staff and contractors discussed the RAIs throughout the meeting. Members of the public were given an opportunity to ask questions pertaining to the RAIs following the discussions between NRC and ISP. The list of meeting attendees is provided in Enclosure 1. The ISP draft RAI responses can be found at ADAMS Accession Number ML19211D027.

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NRC staff and ISP staff discussed RAIs 8-1 and 8-2 which addressed site specific temperatures and associated thermal analyses. ISP explained that thermal calculations were incorporated by reference and that the affected storage systems were approved for use under the general license provisions at storage facilities nationwide. Although they acknowledged that this was true, NRC staff reminded ISP that the general license provisions were not applicable to licensing a storage facility at a specific site.

NRC staff and ISP staff discussed RAIs A-3, B-1, B-3, C-3, D-1, D-2, E-2, E-4, E-6, E-7 and F-5 which addressed canister confinement, storage module seismic capabilities, transfer cask evaluations, important-to-safety structures, systems and components as well as cask tip-over issues. NRC staff noted that referencing analyses for Part 71 transportation systems seemed redundant and that it was unclear how the Part 71 analyses demonstrated compliance with Part 72 regulations. ISP staff explained that the normal conditions of transport analyses for Part 71 systems were intended to demonstrate compliance with the Part 72 confinement regulations. NRC staff emphasized the importance of constructing structures, systems and components in accordance with the design drawings in the safety analysis report (SAR), and NRC staff requested that information in the RAI responses (e.g., references) be added to the SAR.

NRC staff and ISP staff discussed RAI 11-4 which addressed the impact of canisters not meeting the facility's leakage testing criteria for receipt on the safety analyses. NRC explained that it would be beneficial to incorporate information from the RAI response into the confinement chapter of the SAR. ISP committed to incorporating the information.

NRC staff and ISP staff discussed RAIs 3-7 and 5-1 which addressed lifting equipment classification. In discussing RAI 3-7, NRC staff noted that the applicant's Quality Assurance Plan did not provide enough specificity to determine if lifting components satisfied the safety category criteria in NUREG/CR-6407, "Classification of Transportation Packaging and Dry Storage System Components According to Importance to Safety." NRC staff also pointed out that insufficient design criteria information had been provided to determine if lifting equipment had been properly classified in the application. ISP committed to updating the Quality Assurance Plan and providing additional design criteria.

NRC staff and ISP staff discussed RAI 9-4 which addressed neutron detectors at the owner controlled area boundary. ISP indicated that they would either provide additional information to account for neutron dose, or they would incorporate neutron detectors into the facility design.

After the business portion of the open meeting, a member of the public participating by phone asked questions of NRC staff. The member of the public expressed concerns related to defense in depth and the need for redundancy in the use of single failure proof cranes. In addressing these issues, NRC staff pointed out how the regulatory requirements and the guidance used to perform the safety reviews addressed these concerns. In addition, the member of the public expressed the opinion that a hot cell needed to be incorporated into the application. NRC staff responded that a hot cell was not part of the application.

Following the open portion of the public meeting, meeting participants transitioned to the closed portion of the public meeting. In the closed portion of the meeting, NRC and ISP participants

addressed RAIs whose discussion would introduce information of a proprietary nature. These RAIs sought information associated with canister leakage testing during receipt at the proposed site and shielding modeling assumptions for the proposed site.

No regulatory decisions were made at the meeting.

Docket No.: 72-1050

EPID No. L-2017-NEW-0002

Enclosures:

1. Attendance List
2. Meeting Agenda

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DOCUMENT DATE: October 10, 2019

DISTRIBUTION:

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NRC attendees

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Filename: G:\SFST\Nguyen\Casework\WCS\091219 partially closed meeting\MeetingSummary.docx

ADAMS No.: ML19281D885

OFFICE:	SFM		SFM		SFM		SFM	
NAME:	WAllen		WWheatley via e-mail		JNguyen		JMcKirgan	
DATE:	10/7/19		10/7/19		10/8/19		10/10/19	

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PUBLIC MEETING ATTENDEES

Participants: ISP and the Nuclear Regulatory Commission

Date: September 12, 2019, 9:00 A.M. – 2:00 P.M.

Location: Two White Flint North, Room 9-D-4

NAME	AFFILIATION
John McKirgan	NRC
Meraj Rahimi	NRC
John Nguyen	NRC
Chris Allen	NRC
Osiris Siurano-Perez	NRC
Jimmy Chang	NRC
Darrell Dunn	NRC
Jorge Solis	NRC
Steve Jones	NRC
David Tang	NRC
Andrew Barto	NRC
Jack Boshoven	ISP
Mike Callahan	Governmental Strategies Inc.
Jeff Isakson	ISP
Timothy Matthews	Morgan, Lewis & Bockius LLP
Chris Olsen	ISP
Elicia Sanchez	ISP
Earl Easton	ISP
Jan Boudart	Nuclear Energy Information Service
Michael Keegan	Don't Waste Michigan

NON-PUBLIC MEETING ATTENDEES

Participants: ISP and the Nuclear Regulatory Commission

Date: September 12, 2019, 9:00 A.M. – 2:00 P.M.

Location: Two White Flint North, Room 9-D-4

NAME	AFFILIATION
John McKirgan	NRC
Meraj Rahimi	NRC
John Nguyen	NRC
Chris Allen	NRC
Jimmy Chang	NRC
Darrell Dunn	NRC
David Tang	NRC
Andrew Barto	NRC
Jack Boshoven	ISP
Mike Callahan	Governmental Strategies Inc.
Jeff Isakson	ISP
Timothy Matthews	Morgan, Lewis & Bockius LLP
Chris Olsen	ISP
Elicia Sanchez	ISP
Earl Easton	ISP

AGENDA
Meeting between Interim Storage Partners, LLC (ISP) and the
Nuclear Regulatory Commission
September 12, 2019, 2019
9:00 A.M – 2:00 P.M.
Two White Flint, 9-D-4

Open Meeting

9:00 a.m. – 9:10 a.m.	Introductions / Opening Remarks	NRC/ISP
9:10 a.m. – 11:30 a.m.	Discussion of non-proprietary thermal, radiation protection, confinement, materials and operation systems/procedures Requests for Additional Information (RAIs). ⁽¹⁾	NRC/ISP
11:30 a.m. – 12:15 p.m.	Lunch	
12:15 p.m. – 2:25 p.m.	Discussion of non-proprietary structural RAIs. ⁽¹⁾	NRC/ISP
2:25 p.m. – 2:45 p.m.	Public comment period ⁽¹⁾	NRC/Public

Closed Meeting

2:45 p.m. – 2:55 p.m.	Transition / Opening Remarks	NRC/ISP
2:55 p.m. – 3:45 p.m.	Discussion of proprietary operation systems /procedures and radiation protection RAIs ⁽¹⁾	NRC/ISP
3:45 p.m. – 4:00 p.m.	Closing Remarks / Adjourn	NRC/ISP

Start and end times are approximate to facilitate discussion between NRC and ISP.