

Additional Changes Not Associated with the RAIs

During the October 24, 2019 meeting between the Interim Storage Partners LLC (ISP) and the NRC staff to discuss ISP draft responses to the First Request for Additional Information (RAI) Part 3 responses, NRC staff suggested that ISP review the entire Environmental Report (ER) and identify any apparent inconsistencies and resolve or provide justification for the differences, as appropriate. As a result of that review, the following additional changes have been made to the ER that are not related to the Part 3 RAI questions. The changes are discussed below and include a description of each change, the impact on the ER, and a summary of the affected sections of the related documents, as applicable. The changed pages for the Environmental Report are included in Enclosures 7 and 10.

1. Resolve difference between assumptions in Chapter 4 and Chapter 7

- Description: The following table lists differences in Assumptions between the RADTRAN Transportation Evaluation (Chapter 4) and the Cost Benefit Analysis (Chapter 7). The assumptions used in Chapter 4 provide bounding and conservative dose estimates for shipping activities. The assumptions used in Chapter 7 represent the expected or planned estimates related to shipping activities.

Description	Chapter 4	Chapter 7
Purpose	Calculate doses	Calculate costs
Casks per shipment	1 and 3	5 or 6
Number of casks shipped per year	200 per year (80 shipments) 2.5 casks/shipment	0 – 200 per year 5 casks/shipment
Total number of shipments over 40 years	3200 (200 per year times 40) Based on facility capacity for handling shipments	673 (based on actual projections and 40000 MTU limit)
Total number of casks shipped	8000	3368

- Environmental Report Impact: Add an acknowledgment to Chapter 4 that the shipping assumptions may differ from the assumptions used in Chapter 7, but are appropriate because they are bounding and conservative for determining bounding dose estimates. It is noted that a similar explanation has been added to Chapter 7 as part of the responses to the Cost Benefit RAIs.
- ER Section 4.2.6.1 has been revised as described the Environmental Report Impact.

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2. Update the approximate dimensions of the Security Building and Cask Handling Building based on updated designs

- Description: Since the ER was originally written, the dimensions of the Cask Handling Building and Security and Administrative building have been updated. This change necessitates updates to the dimensions reported in the ER.
- Environmental Report Impact: Update the dimensions of the Cask Handling Building in Section 2.2.2.3 and the dimensions of the Security and Administrative building in Section 2.2.2.4.
- ER Sections 2.2.2.3 and 2.2.2.4 have been revised as described the Environmental Report Impact.

3. Update the travel speed range for heavy-haul transfer trucks

- Description: Updated the reported heavy-haul transfer truck speed range in Chapter 3 to encompass the assumed speed used in Chapter 4 to calculate dose estimates for shipping activities.
- Environmental Report Impact: Update reported heavy-haul transfer truck speed range in Chapter 3 to encompass the assumed speed used in Chapter 4 to calculate dose estimates for shipping activities.
- ER Section 3.2.1 has been revised as described the Environmental Report Impact.

4. Remove Figures 4.2-2 and 4.2-3

- Description: ER Figures 4.2-2 and 4.2-3 were inadvertently left in Chapter 4 following the rewrite of the Section 4.2.6 Radiological Impacts of Transportation in response to the Transportation RAIs submitted via ISP Letter E-54423, dated June 28, 2019. These figures are not referenced in the ER and are not germane to updated Section 4.2.6.
- Environmental Report Impact: Update Figures 4.2-2 and 4.2-3 to state "Not Used".
- ER Figures 4.2-2 and 4.2-3 have been revised as described the Environmental Report Impact.

5. Update various sections of the ER for the expected number of canisters to be shipped to the eventual 40,000 MTU WCS CISF

- Description: There are several places within the ER that reference the expected number of canisters to be stored at the eventual 40,000 MTU WCS CISF. The expected number of canisters that will eventually be stored at a 40,000 MTU WCS CISF is calculated to be 3,368 or approximately 3,400. This change is to clarify that expected number throughout the ER.
- Environmental Report Impact: Update Section 3.2 to indicate that approximately 3,400 canisters will eventually be transported to a 40,000 MTU WCS CISF. Similarly, Section

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4.13.4 has been updated to indicate that approximately 3,400 concrete overpacks will be fabricated to house the canisters for a 40,000 MTU WCS CISF.

- ER Sections 3.2 and 4.13.4 have been revised as described the Environmental Report Impact.

6. Add missing reference to ER Section 3.5.3.3

- Description: The first sentence in the second paragraph of ER Section 3.5.3.3 is incomplete, missing a reference to Appendix 2.9.1 of the Waste Control Specialists Licensing Application for the LLRW.
- Environmental Report Impact: Add the missing text to point to Appendix 2.9.1 of the Waste Control Specialists Licensing Application for the LLRW.
- ER Section 3.5.3.3 has been revised as described the Environmental Report Impact.

7. Add clarification to ER Section 4.5.3 that start dates may move based on when the license is issued.

- Description: ER Section 4.5.3 lays out an high level schedule for when License 72-1050 will be issued, construction will commence and start of operations. Throughout the ER these dates are used to provide the timing of emissions, etc. However, the start of construction and operations is contingent on receipt of the license and satisfying all applicable license conditions.
- Environmental Report Impact: Add a statement to Section 4.5.3 indicating that while the start dates for these activities may move, it only impacts the start dates, but the durations and emissions remain unimpacted.
- ER Section 4.5.3 has been revised as described the Environmental Report Impact.