



## INTERIM STORAGE PARTNERS

June 8, 2018  
E-51587

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:** Submittal of License Application Revision 2 and Request to Restart  
Review of Application for Approval of the WCS CISF, Docket 72-1050

- Reference:**
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 and Reactor-Related Greater Than Class C (GTCC) Low-Level Waste in Andrews County, Texas, dated April 28, 2016
  2. Letter from Mark Lombard (NRC) to Michael Ford (WCS), "License Application To Construct And Operate A Consolidated Interim Storage Facility For Spent Nuclear Fuel In Andrews County, Texas – Accepted For Review (CAC NO. L25175)", January 26, 2017.
  3. Letter from Michael Ford (WCS) to Michael Layton (NRC), Submittal of Revision 1 to the WCS License Application Requesting Authorization to Construct and Operate a Consolidated Interim Storage Facility (CISF) for Spent Nuclear Fuel and Reactor-Related Greater Than Class C (GTCC) Low-Level Waste in Andrews County, Texas, dated March 16, 2017.
  4. Letter from Rod Baltzer (WCS) to NRC Document Control Desk, Request to Temporally Suspend All Safety and Environmental Review Activities Related to the WCS Consolidated Interim Storage Facility Application for Spent Nuclear Fuel in Andrews County, Texas, dated April 18, 2017.

Waste Control Specialists LLC filed an Application with the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR Part 72 for a license that would allow it to construct and operate the WCS Consolidated Interim Storage Facility (WCS CISF) in Andrews

County, TX, Docket No. 72-1050 (Reference 1). Following Waste Control Specialists' responses to Requests for Supplemental Information (RSIs), the NRC accepted the License Application for review (Reference 2). Waste Control Specialists thereafter submitted Revision 1 (Reference 3) of the License Application to the NRC to incorporate the changes made in response to the NRC's RSIs. In April 2017, Waste Control Specialists subsequently requested that the NRC temporarily suspend the review of the License Application (Reference 4).

Subsequent to the Waste Control Specialists' request to suspend the review of the License Application, its parent (Valhi, Inc.) sold it to J.F. Lehman & Company in January 2018. In addition, Waste Control Specialists and Orano CIS LLC (a subsidiary of Orano USA) formed a joint venture, Interim Storage Partners LLC (ISP), whose purpose is to complete the licensing of, and then construct and operate, the WCS CISF. The ISP joint venture provides for a stronger project delivering predictability and taking advantage of the strong nuclear design, licensing, construction and operations experience that the two companies bring to the venture.

As a result of the ISP joint venture, the role and responsibilities as Applicant for the license that would permit the Applicant to construct and operate the WCS CISF in Andrews County, Texas is passed from Waste Control Specialists to ISP. However, Waste Control Specialists continues to support the project in much the same way, including providing access to the land for the WCS CISF, operational support, and waste disposal.

ISP requests that the NRC resume all safety and environmental review activities associated with the License Application that would permit ISP to construct and operate the WCS CISF associated with Docket No. 72-1050. Because of the change in ownership of the WCS CISF from Waste Control Specialists to ISP, ISP submits this Revision 2 of the License Application, including revisions of the Safety Analysis Report (SAR) and Environmental Report (ER), for use by the NRC in its resumption of the review of the License Application.

Earlier activities by Waste Control Specialists necessary to support the License Application are adopted by ISP, and the revised License Application refers to ISP as if it performed those activities. ISP retains the nomenclature of "WCS CISF" for the facility. Revision 2 changes to the License Application documents are tracked with italicized text and revision bars in the right margin to provide NRC staff reviewers and the public with a convenient way to identify the changes made since Revision 1.

The changes in Revision 2 primarily are made to:

1. Reflect that ISP has adopted the TN Americas (TN Americas LLC is a subsidiary of Orano USA) Quality Assurance Program for the WCS CISF.
2. Change the Applicant from Waste Control Specialists to ISP, including
  - a. an updated business structure and organization chart and
  - b. an updated financial information/assurance.
3. Include an alternative that ISP may contract with Spent Nuclear Fuel title holders other than the U.S. Department of Energy.

This submittal contains proprietary information, which may not be used for any purpose other than NRC staff review of the License Application. In accordance with 10 CFR 2.390, I am providing affidavits specifically requesting the protection of proprietary information from disclosure. Public versions of the proprietary SAR parts are provided.

The following enclosures are included:

1. ISP Application for a License for a Consolidated Interim Spent Fuel Storage Facility Revision 2
2. WCS Consolidated Interim Storage Facility System Safety Analysis Report, Revision 2 (Proprietary Version)
3. WCS Consolidated Interim Spent Fuel Storage Facility Environmental Report, Revision 2
4. Affidavits Pursuant to 10 CFR 2.390
  - a. Waste Control Specialist LLC
  - b. NAC International
  - c. TN Americas (E-51587)
5. WCS Consolidated Interim Storage Facility System Safety Analysis Report, Revision 2 (Non-proprietary Version)

With the exception of the Physical Security Plan and the Safeguards Contingency Plan, other documents that were submitted with License Application Revision 1 do not need to be revised and remain applicable to the License Application. The revised Physical Security Plan and Safeguards Contingency Plan will be submitted in the near future under separate cover letter because these documents contain Safeguards Information.

ISP requests that the NRC expeditiously restart its review of the License Application, including completion of the environmental scoping period and restart of the hearing process. Following Waste Control Specialists' request to temporarily suspend the proceeding, Waste Control Specialists and the NRC staff jointly requested Commission approval to withdraw the *Federal Register* notice providing an opportunity to submit hearing requests on the License Application. The Commission granted that request on June 22, 2017 (Order CLI-17-10) and directed the NRC staff to publish a new notice of opportunity to request a hearing in the *Federal Register* if requested to resume review of the License Application. Importantly, the Commission declined to extend the 60-day period specified in 10 CFR 2.309(b) for hearing requests. Additionally, although the Commission concluded that the NRC staff should reopen the scoping comment period, it declined to specify an extended comment period. Given the minimal changes and the near completion of the scoping period, ISP requests that the NRC staff notice only a minimal scoping period.

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

ISP is submitting this Revision to the License Application under oath or affirmation. Accordingly, pursuant to 10 CFR 72.16(b), I declare under penalty of perjury that the information contained herein is true and correct to the best of my knowledge.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Isakson', with a long horizontal flourish extending to the right.

Jeffery D. Isakson  
Chief Executive Officer/President  
Interim Storage Partners LLC

cc: John (Chau) N. Nguyen (NRC SFM) as follows, all provided in a separate mailing:

Enclosures:

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