

A
TRANSNUCLEAR
AN AREVA COMPANY

August 23, 2007
E-25421

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Supplemental Information Regarding the Application for Amendment 11 of the NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0, Docket No. 72-1004, (TAC No. L24080)

Reference: Letter from Tara Neider (TN) to Document Control Desk, "Application for Amendment 11 of the NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0," April 10, 2007

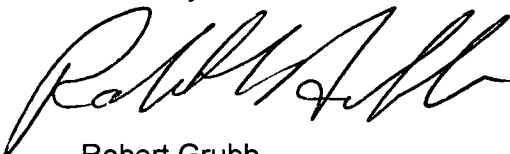
Gentlemen:

Based on recent discussions with the NRC staff, Transnuclear, Inc. (TN) hereby provides three shielding calculations and four thermal calculations to facilitate NRC staff review of the CoC No. 1004 Amendment 11 application. The shielding calculations are proprietary versions, and all of the calculations are provided without associated discs, per agreement with the NRC staff. The application submittal referenced above contained input and output computer files associated with certain analyses associated with Amendment 11. TN intends to submit Non-proprietary versions of the shielding calculations to the Document Control Desk within 30 days.

This submittal includes proprietary information which may not be used for any purpose other than to support NRC staff's review of the application. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that this proprietary information be withheld from public disclosure.

Should the NRC staff require additional information regarding this submittal, please do not hesitate to contact Mr. Don Shaw at 410-910-6878 or me at 410-910-6930.

Sincerely,



Robert Grubb
Senior Vice President - Engineering

cc: Mr. Joseph Sebrosky (NRC SFST) (one paper copy of this cover letter and Enclosure 1, three paper copies of Enclosures 2 through 8, and one compact disc containing a copy of Enclosures 2 through 8)

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Transnuclear, Inc. Calculation NUH06L-0500, "Design of Integral Radiation Shield for On-Site Transfer Cask OS197-L and Calculation of Occupational Exposure due to 32PT DSC Design Basis Fuel," Revision 1 (proprietary version, without discs)
3. Transnuclear, Inc. Calculation NUH06L-0501, "OS197L 75 Ton Transfer Cask As-Built Configuration Shielding Analysis," Revision 2 (proprietary version, without discs)
4. Transnuclear, Inc. Calculation NUH06L-0503, "OS197L Occupational Exposure due to Remote Handling Device Failure," Revision 0 (proprietary version, without discs)
5. Transnuclear, Inc. Calculation NUH06L-0401, "CFD Evaluation of OS197L Transfer Cask within Transfer Skid Auxiliary Shielding," Revision 2 (without discs)
6. Transnuclear, Inc. Calculation NUH06L-0402, "Thermal Analysis of 32PT DSC in OS197L Transfer Cask," Revision 0 (without discs)
7. Transnuclear, Inc. Calculation NUH06L-0403, "Thermal Analysis of 61BT DSC in OS197L Transfer Cask," Revision 0 (without discs)
8. Transnuclear, Inc. Calculation NUH06L-0404, "Thermal Analysis of 24PHB DSC in OS197L Transfer Cask," Revision 0 (without discs)

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

Transnuclear, Inc.)
State of Maryland) SS.
County of Howard)

I, Robert Grubb, depose and say that I am Senior Vice President of Transnuclear, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission’s regulations for withholding this information.

The information for which proprietary treatment is sought consists of certain portions of the Transnuclear, Inc. calculations listed below:

- Transnuclear, Inc. Calculation NUH06L-0500, “Design of Integral Radiation Shield for On-Site Transfer Cask OS197-L and Calculation of Occupational Exposure due to 32PT DSC Design Basis Fuel,” Revision 1
- Transnuclear, Inc. Calculation NUH06L-0501, “OS197L 75 Ton Transfer Cask As-Built Configuration Shielding Analysis,” Revision 2
- Transnuclear, Inc. Calculation NUH06L-0503, “OS197L Occupational Exposure due to Remote Handling Device Failure,” Revision 0

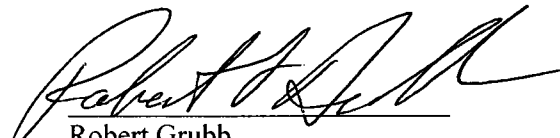
I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission’s regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

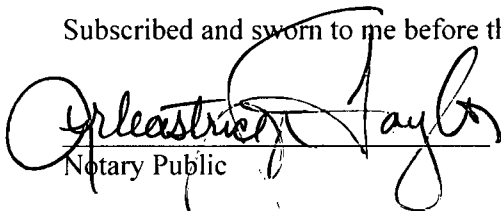
- 1) The information sought to be withheld from public disclosure involves certain shielding analyses associated with the OS197L transfer cask design, which are owned and have been held in confidence by Transnuclear, Inc. Certain of these analyses document evaluation of various design configurations used during the initial design phase, in the process of design optimization. Only one of the configurations was used in the final design reflected in the amendment application and the related 72.48 evaluation. The others were not used for the final design, are not relevant to the amendment application, and are therefore considered proprietary.
- 2) The information is of a type customarily held in confidence by Transnuclear, Inc. and not customarily disclosed to the public. Transnuclear, Inc. has a rational basis for determining the types of information customarily held in confidence by it.
- 3) The information will be shared with the Commission in confidence under the provisions of 10 CFR 2.390 with the understanding that it is to be reviewed in confidence by the Commission.

- 4) The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
- 5) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because:
 - a) A similar product is manufactured and sold by competitors of Transnuclear, Inc.
 - b) Development of this information by Transnuclear, Inc. required expenditure of considerable resources. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.
 - c) In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of a design and analysis of a dry spent fuel storage system.
 - d) The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
 - e) The information consists of certain descriptions of the design and analysis of dry spent fuel storage systems, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Transnuclear, Inc., take marketing or other actions to improve their product's position or impair the position of Transnuclear, Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
 - f) In pricing Transnuclear, Inc.'s products and services, significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses must be included. The ability of Transnuclear, Inc.'s competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Further the deponent sayeth not.


Robert Grubb
Senior Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 23rd day of August, 2007.


Notary Public

My Commission Expires 10 / 14 / 2008

