

SMUD

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DPG 09-234

July 29, 2009

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555

Docket No. 72-11
Rancho Seco Independent Spent Fuel Storage Installation
License No. SNM-2510

**RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION
ADDITIONAL INFORMATION FOR PROPOSED LICENSE AMENDMENT NO.
3**

Attention: Shana Helton

In SMUD letter MPC&D 08-090, dated November 5, 2008, we submitted Proposed Amendment No. 3 to the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) Technical Specifications. Based on previous discussions, we are providing you with proprietary and non-proprietary versions of the following calculations:

1. Criticality calculation 13302-0600 "Rancho Seco NUHOMS 24P Criticality Analysis – Damaged Fuel Evaluation for as-loaded FO- and FC- DSCs."
2. Thermal calculation 13302-0404 "Thermal Evaluation of FC DSC Loaded with Damaged Fuel Assemblies."
3. Thermal calculation 13302-0403 "Transient Thermal Analysis of FO/FC Canister during Vacuum Drying" (Reference No. 3 in Calculation 13302-0404).

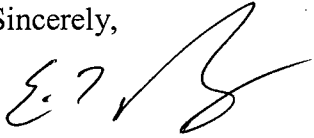
In accordance with 10 CFR 2.390, we are including an affidavit requesting that the NRC withhold portions of calculation numbers 13302-0600, 13302-0404, and 13302-0403, which contain proprietary information, from public disclosure.

We are also including a hardcopy of vacuum drying durations and DSC loading data, which is Reference No. 7 in Calculation 13302-0404. The information regarding vacuum drying durations and DSC loading data is not proprietary and may be placed in the Public Document Room.

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If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Ronningen', with a stylized flourish at the end.

Einar Ronningen
Superintendent, Rancho Seco Assets

Cc: Shana Helton, NRC Headquarters

Attachment 1: Proprietary Calculations

Attachment 2: Non-proprietary Calculations

Attachment 3: Vacuum Drying Durations and DSC Loading Data

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 Chief Operating Officer of Transnuclear, Inc., duly authorized to execute 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 is listed below:

1. Transnuclear, Inc. Calculation No. 13302-0403, "Transient Thermal Analysis of FO/FC Canister during Vacuum Drying," Revision 0, January 15, 2008,
2. Transnuclear, Inc. Calculation No. 13302.0404, "Thermal Evaluation of FC DSC loaded with Damaged Fuel Assemblies," Revision 0, March 20, 2008,
3. Transnuclear, Inc. Calculation No. 13302-0600, "Rancho Seco NUHOMS[®]-24P Criticality Analysis – Damaged Fuel Evaluation for As Loaded FO- and FC- DSCs," Revision 1, September 19, 2008.

These documents have been appropriately designated as proprietary.

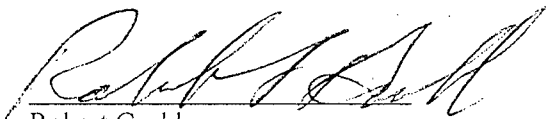
I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

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 should be withheld.

- 1) The information sought to be withheld from public disclosure involves certain thermal and criticality analyses of spent fuel storage dry shielded canister designs, which are owned and have been held in confidence by Transnuclear, Inc.
- 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 is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.390 with the understanding that it is to be received 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 involves 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
Chief Operating Officer, Transnuclear, Inc.

Subscribed and sworn to me before this 7th day of May, 2009.


Notary Public

My Commission Expires: 10/14/2012

