



September 1, 2000
NUH03-00-1644
RMG-00-019

Mr. Steven Baggett
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike M/S 0-6-F-18
Rockville, MD 20852

Subject: Final Safety Analysis Report (FSAR) for the NUHOMS® Horizontal Modular Storage System For Irradiated Nuclear Fuel", Revision 5.

- References:**
1. Certified Safety Analysis Report (CSAR) for the NUHOMS® Horizontal Modular Storage System For Irradiated Nuclear Fuel", Revision 4A
 2. Certificate of Compliance (CoC) No. 1004, Amendment No. 1, dated April 27, 2000.
 3. Certificate of Compliance (CoC) No. 1004, Amendment No. 2, Effective September 5, 2000

Dear Mr. Baggett:

Transnuclear West Inc., (TN West) herewith submits Revision 5 of the subject FSAR which incorporates changes to the CSAR (Reference 1) resulting from the recent approval of TN West Amendments 1 and 2 to CoC 1004 (References 2 and 3).

In accordance with the requirements of Reference 2, the title of the SAR has been revised to "Final Safety Analysis Report for the NUHOMS® Horizontal Modular Storage System For Irradiated Nuclear Fuel." The FSAR also reflects a change in ownership of the CoC from VECTRA Technologies, Inc., to TN West.

A new Appendix J has been added and the existing Appendix H has been modified to reflect the authorization to store PWR Fuel with Burnable Poison Rod assemblies (BPRAs) in the NUHOMS® 24P Long Cavity DSC per Reference 3. In addition, the applicable design criteria, and thermal, shielding and structural analyses affected by the authorization to store PWR and

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BWR fuels with burnups up to 45,000 MWD/MTU per Reference 3 have been revised accordingly.

Per our earlier discussion with you, TN West delayed the issue date of the FSAR from the required 90 days following approval of Amendment 1 to allow inclusion of changes into the FSAR resulting from approval of Amendment 2.

Finally, the FSAR also incorporates all changes to the NUHOMS[®] system implemented per Condition 9 of CoC No. 1004 since June 1996 (Reference 1 issue date) through March 31, 2000. TN West is submitting separately a summary of all such changes and supporting safety evaluations.

The contents of Appendix E and Appendix F of the FSAR are proprietary and should be withheld from public disclosure. In accordance with 10 CFR 2.790, an affidavit specifically requesting that you withhold this proprietary information from public disclosure is enclosed.

Should you or your staff require additional information to support review of this application, please do not hesitate to contact Mr. U. B. Chopra (510-744-6053) or me (510-744-6020).

Sincerely,



Robert M. Grenier
President and Chief Operating Officer

Docket 72-1004

Attachments: 1. Affidavit for withholding proprietary information.

2. Ten (10) copies of Final Safety Analysis Report (FSAR) for the NUHOMS[®] Horizontal Modular Storage System For Irradiated Nuclear Fuel", Revision 5.

AFFIDAVIT PURSUANT
TO 10 CFR 2.790

Transnuclear West Inc.)
State of California) SS.
County of Alameda)

I, Robert M. Grenier, depose and say that I am President and Chief Operating Officer of Transnuclear West 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 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the documents included in Attachment 2 (FSAR) of this submittal and as listed below:

- Appendix E Drawings
- Appendix F

These sections of the document have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Transnuclear West 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 2.790 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 is design drawings and calculations of NUHOMS[®] Cask, which is owned and has been held in confidence by Transnuclear West Inc.
- 2) The information is of a type customarily held in confidence by Transnuclear West Inc. and not customarily disclosed to the public. Transnuclear West 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 2.790 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 West Inc. because:

- a) A similar product is manufactured and sold by competitors of Transnuclear West Inc.
- b) Development of this information by Transnuclear West Inc. required thousands of man-hours and hundreds of thousands of dollars. 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 description of the design and analysis of a dry spent fuel storage and transportation system, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Transnuclear West Inc., take marketing or other actions to improve their product's position or impair the position of Transnuclear West's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- f) In pricing Transnuclear West's products and services, significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses must be included. The ability of Transnuclear West'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 M. Grenier
President and Chief Operating Officer
Transnuclear West Inc.

Subscribed and sworn to me before this, September 1, 2000, by Robert M. Grenier.


Notary Public

