



January 5, 2001
DCS-TNW0101-04
RMG-01-001

Mr. Timothy Kobetz
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Transmittal of Transnuclear West Structural Calculations Supporting the Advanced NUHOMS System Application; TAC No. L23203

Reference: Application for Approval of Advanced NUHOMS® Horizontal Modular Storage System for Irradiated, Safety Analysis Report, ANUH-01.0150, Revision 0; submitted to the NRC under TNW to NRC (Grenier to Baggett) letter DCS-TNW0009-15, dated September 29, 2000

Dear Mr. Kobetz:

Per your request, Transnuclear West is hereby submitting structural calculations prepared in support of the Reference application. Two sets of calculations are enclosed. The first is a proprietary set which is identified by a Proprietary stamp on the calculation cover sheets and associated electronic discs of computer input files, as applicable. The second set is a non-proprietary set which is designated by a "NP" at the end of the calculation number. Please note that Calculations SCE-01.0202 and SCE-01.0204 do not contain any proprietary information, two copies of these calculations are provided, one for staff review and one for the PDR.

The proprietary versions of the attached calculations should be withheld from public disclosure. An affidavit is attached to this letter, prepared in accordance with 10 CFR 2.790, requesting that you withhold these proprietary calculations from public disclosure.

Transnuclear West Inc.
39300 Civic Center Drive, Suite 280, Fremont, CA 94538
Phone: 510-795-9800 • Fax: 510-744-6002

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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 72-1029

Enclosures: No. 1 – Proprietary Calculations

SCE-01.0200, Rev. 2
SCE-01.0201, Rev. 1
SCE-01.0203, Rev. 2
SCE-01.0205, Rev. 1
SCE-01.0207, Rev. 1
SCE-01.0208, Rev. 2
SCE-01.0209, Rev. 2
SCE-01.0214, Rev. 1

No. 2 – Non-Proprietary Calculations

SCE-01.0200NP, Rev. 2
SCE-01.0201NP, Rev. 1
SCE-01.0202, Rev. 0 (2 copies)
SCE-01.0203NP, Rev. 2
SCE-01.0204, Rev. 2 (2 copies)
SCE-01.0205NP, Rev. 1
SCE-01.0207NP, Rev. 1
SCE-01.0208NP, Rev. 2
SCE-01.0209NP, Rev. 2
SCE-01.0214NP, Rev. 1

No.3 – Affidavit Pursuant to 10 CFR 2.790

**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 Enclosure 1 of Letter DCS-TNW0101-04, dated 1/5/01, and as listed below:

- Calculation SCE-01.0200, Rev. 2
- Calculation SCE-01.0201, Rev. 1
- Calculation SCE-01.0203, Rev. 2
- Calculation SCE-01.0205, Rev. 1
- Calculation SCE-01.0207, Rev. 1
- Calculation SCE-01.0208, Rev. 2
- Calculation SCE-01.0209, Rev. 2
- Calculation SCE-01.0214, Rev. 1

These documents have been appropriately designated as proprietary.

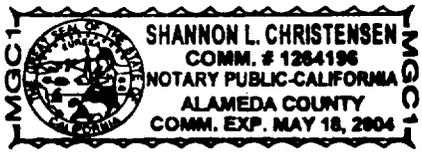
I have personal knowledge of the criteria and procedures utilized by Transnuclear West Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

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 calculations of Advanced 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
 Robert M. Grenier
 President and Chief Operating Officer
 Transnuclear West Inc.

Subscribed and sworn to me before this 5th day of January, 2001, by Robert M. Grenier.

Shannon L. Christensen
 Notary Public



ENCLOSURE NO. 2

NON-PROPRIETARY
CALCULATIONS
TO SUPPORT
AHSM SAR ANUH-01.0150

VOLUME 1 OF 2