

October 31, 2001

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Submittal of NAC International Topical Report 790-TR-001, Revision 1, "Requirements for Dry Storage of High Burnup Fuel"

- References:
1. Submittal of NAC International Topical Report 790-TR-001, Revision 0, "Requirements for Dry Storage of High Burnup Fuel," (Proprietary Version), NAC International, July 25, 2001
 2. Submittal of Nonproprietary Version of the NAC International High Burnup Fuel Topical Report (790-TR-001-NP, Revision 0), NAC International, August 15, 2001
 3. Public Disclosure Determination for NAC High Burnup Topical, U.S. Nuclear Regulatory Commission, September 13, 2001
 4. Conference Calls - License to Disclose Bibliography in Appendix, NRC and NAC, October 12, 2001
 5. Submittal of Revised Nonproprietary Version of the NAC International High Burnup Fuel Topical Report (790-TR-001-NP, Revision 0), NAC International, October 12, 2001

NAC International (NAC) herewith submits five copies of the NAC Proprietary Topical Report 790-TR-001, Revision 1, "Requirements for Dry Storage of High Burnup Fuel." The Appendix A, Bibliography, of the Reference 1 submittal has been deleted in accordance with the Reference 4 discussions, which includes the revision of the Table of Contents and Page 1-2 to delete any reference to the Appendix. NAC requests that the U.S. Nuclear Regulatory Commission (NRC) review this Topical Report and provide acceptance of the approach and methodology for predicting fuel cladding behavior during dry storage.

NAC Topical Report 790-TR-001, Revision 1, is NAC Proprietary Information. The executed Proprietary Information Affidavit is attached. NAC is also submitting a non-proprietary version of this Topical Report today.

If you have any comments or questions, please contact me on my direct line at (678) 328-1321.

Sincerely,



Thomas C. Thompson
Director, Licensing
Engineering & Design Services

Enclosures

ED20011338

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AFFIDAVIT

IN SUPPORT OF PROPRIETARY INFORMATION CONTAINED IN NAC INTERNATIONAL TOPICAL REPORT 790-TR-001, REVISION 1, “REQUIREMENTS FOR DRY STORAGE OF HIGH BURNUP FUEL”

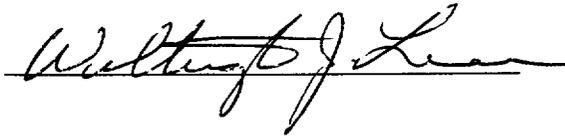
State of Georgia, County of Gwinnett

Willington J. Lee (Affiant), Vice President & Chief Engineer of NAC International, hereinafter referred to as NAC, at 655 Engineering Drive, Norcross, Georgia 30092, being duly sworn, deposes and says that:

1. Affiant is personally familiar with the trade secrets and privileged information contained in the NAC Topical Report 790-TR-001, Revision 1, that is being submitted. Affiant requests that the Nuclear Regulatory Commission, pursuant to Chapter 10 of the Code of Federal Regulations, Part 2.790 (10 CFR 2.790) “Public Inspections, Exemptions, Request for Withholding,” withhold the information contained within the Topical Report being submitted, hereafter referred to as the Proprietary Material, from public disclosure.
2. This information has been and is held in confidence by NAC.
3. The information contained within the Proprietary Material is the result of a computer code that was developed by NAC. This type of information is held in confidence based on the significant commercial investment of time and money expended in its development.
4. The Proprietary Material being transmitted to the Nuclear Regulatory Commission in confidence includes NAC Topical Report 790-TR-001, Revision 1.
5. The information that is being claimed as trade secret and privileged information has not been and is not available in public sources.

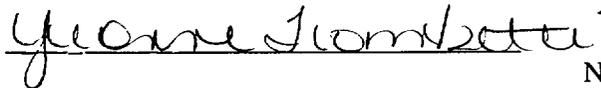
AFFIDAVIT
(continued)

6. NAC has invested a considerable amount of time, engineering labor, and money in the development of this Topical Report. Public disclosure of this information would cause substantial harm to the competitive position of NAC. Others seeking to develop similar analysis would have to make similar investments to develop the information on their own as long as the information is not disclosed to the public.



Wellington J. Lee
Vice President & Chief Engineer
Engineering & Design Services
NAC International

Subscribed and sworn to before me this 31st day of October 2001.



Notary Public in and for the
County of Cobb
State of Georgia

My commission expires the 4th day of November, 01

Notary Public, Cobb County, Georgia
My Commission Expires Nov. 4, 2002