



April 30, 2003
 NUH03-03-026

Ms. Mary Jane Ross-Lee
 Spent Fuel Project Office, NMSS
 U. S. Nuclear Regulatory Commission
 11555 Rockville Pike M/S 0-6-F-18
 Rockville, MD 20852

Subject: Application for Amendment No.1 of Advanced NUHOMS® Certificate of Compliance (CoC) No. 1029 for Dry Spent Fuel Storage Casks, Revision 0

References:

1. Standardized Advanced NUHOMS® System CoC No. 1029, Revision 0.
2. Standard Review Plan for Dry Cask Storage Systems, NUREG-1536, January 1997.
3. Standardized Advanced NUHOMS® Horizontal Modular Storage System Final Safety Analysis Report (FSAR), Revision 0 (File ANUH-01-0150).

Dear Ms. Ross-Lee:

Transnuclear Inc. (TN) herewith submits its Application for Amendment No. 1 of the Standardized Advanced NUHOMS® System CoC No. 1029 (Reference 1). This application proposes to add a new Dry Shielded Canister (DSC), designated the NUHOMS® 24PT4-DSC, to the authorized contents of the Advanced NUHOMS® System.

The NUHOMS® 24PT4-DSC is a transportable canister designed to accommodate intact and/or damaged CE 16x16 fuel assemblies, with an assembly average burn up of up to 60,000 MWd/MTU, a maximum enrichment level of 4.85 wt. % U-235 and a maximum heat load of 24 kW per DSC. It is designed for use with the existing Advanced Horizontal Storage Module (AHSM) and NUHOMS® transfer cask OS197H (TC). No change is required to the previously licensed AHSM or TC design to accommodate the new canister.

This submittal is organized in the following format to facilitate your staff's review:

Attachment A: Description, Justification and Evaluation of Amendment Changes,
 Attachment B: Suggested Changes to CoC 1029 Technical Specifications and Associated Bases,
 and
 Attachment C: Proposed Appendix A of the FSAR (Proprietary Information).

Attachment C includes a complete evaluation of the NUHOMS® 24PT4-DSC and is prepared in a format consistent with the Standard Review Plan for Dry Cask Storage (Reference 2). Where analyses are bounded by the existing FSAR (Reference 3), those sections of the FSAR are

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referenced. References preceded with an "A" refer to sections in the Appendix while those not preceded with an "A" refer to the FSAR.

This submittal includes proprietary information which may not be used for any purpose other than to support your staff's review of the application. In accordance with 10 CFR 2.790, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public disclosure.

The proprietary information submitted herewith includes an alternative thermal analysis (Enclosure 4) of the 24PT1 and 24PT4-DSCs. This analysis provides an independent confirmation of the adequacy of the fuel effective conductivity values used in the ANSYS thermal model.

Southern California Edison (SCE) plans to initiate fabrication of 24PT4-DSCs in January 2004 to support their fuel loading activities for San Onofre Units 2 and 3. To support the needs of SCE, TN respectfully requests that the staff assign appropriate priority for review of this application consistent with the issuance of an amended CoC by September 2004.

TN looks forward to working with you and your staff on this amendment. TN is prepared to meet with you shortly after you have received this amendment to discuss the contents of the submittal and resolve any questions you might have. Should you or your staff require additional information to support review of this application, please do not hesitate to contact me at 510-744-6053 or Mr. Jayant Bondre at 510-744-6043.

Sincerely,



U. B. Chopra
Licensing Manager

Docket 72-1029

- Enclosures:
1. Affidavit for withholding proprietary information.
 2. Ten (10) copies of Application for Amendment No. 1 to Advanced NUHOMS[®] COC 1029 (Proprietary Version).
 3. Three (3) copies of Application for Amendment No. 1 to Advanced NUHOMS[®] COC 1029 (Non-Proprietary Version).
 4. Calculation, "Alternative Thermal Analysis of the 24PT1 and 24PT4 Canister for SCE," Calculation Number SCE-23.0404, Revision 1 (Proprietary).

AFFIDAVIT PURSUANT
TO 10 CFR 2.790

Transnuclear, Inc.)
State of Washington) SS.
County of Pierce)

I, William D. Gallo, 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 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Attachment C (Enclosure 2) and Calculation package (Enclosure 4) of this submittal as listed below:

1. Attachment C, Revision 0 (Proprietary Version).
2. Calculation SCE-23.0404, Revision 1 (Proprietary).

These files 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 2.790 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 are a calculation package, licensing drawings, supporting safety analysis and Input files relating to the analysis of the Advanced NUHOMS[®] Cask, which is owned and has 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 2.790 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, 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 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, 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.

William D. Gallo
Senior Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 30th day of April, 2003, by William D. Gallo.

Bonnie M. Hargis
Notary Public

