

A TRANSNUCLEAR

E-21335
July 6, 2004

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: Additional Information for NUHOMS® HD Storage System
Docket No. 72-01030.

Dear Ms. Ross-Lee:

We are enclosing the additional thermal information that was requested during our telecom of last week. Specifically, the enclosed CD contains the necessary ANSYS files to recreate Figures 4-28 and 4-29, the macro to create the data in Table 4-19, and the spread sheet for Table 4-24. Additionally, we have discovered errors in two SAR tables. The units of h_c in Table 4-19 should have been shown as (BTU/hr-ft² - °F) and in the lead table on page 4-5, the headings for the 2nd and 3rd columns are reversed. These corrections will be made in Revision 1 of the SAR.

The ANSYS files are considered proprietary and an affidavit for this proprietary information is enclosed

If you or your staff have any questions concerning this material, please contact me.

Sincerely,



Michael Mason
Chief Engineer

- Enclosures: 1. Affidavit for withholding proprietary information.
2. One CD

AFFIDAVIT

STATE OF NEW YORK

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COUNTY OF WESTCHESTER

Before me, the undersigned authority, personally appeared Alan Hanson who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Transnuclear, Inc. and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:


ALAN HANSON

Sworn to and subscribed
Before me this 6 day
of July, 2004.



REGINA GREAGOR
Notary Public, State of New York
No. 4959351
Qualified in Westchester County
Commission Expires November 27, 2005

- (1) I am President of Transnuclear, Inc. and my responsibilities include reviewing the proprietary information sought to be withheld from public disclosure in connection with the licensing of spent fuel transport cask systems or spent fuel storage cask systems. I am authorized to apply for its withholding on behalf of Transnuclear, Inc.
- (2) I am making this Affidavit in conformance with the provisions of 10CFR Section 2.790 of the commission's regulations and in conjunction with the Transnuclear application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Transnuclear in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) The following information is furnished pursuant to the provisions of paragraph 10CFR 2.790(b)(4) to determine whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Transnuclear.
 - (ii) The information is of a type customarily held in confidence by Transnuclear, is not customarily disclosed to the public and is transmitted to the commission in confidence.
 - (iii) The information sought to be protected is not now available in public sources to the best of our knowledge and belief and the release of such information might result in a loss of competitive advantage as follows:
 - (a) It reveals the distinguishing aspects of a storage system where prevention of its use by any of Transnuclear's competitors without license from Transnuclear constitutes a competitive economic advantage over other companies.
 - (b) It consists of supporting data, including test data, relative to a component or material, the application of which secures a competitive economic or technical advantage.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (5) The information is being transmitted to the commission in confidence and, under the provision of 10CFR Section 2.390, it is to be received in confidence by the Commission.

- (6) The information sought to be protected is not available in public sources to the best of our knowledge and belief.
- (7) The proprietary information sought to be withheld is information contained in the Safety Analysis Report for the NUHOMS[®] -32PTH HD System. Specifically, ANSYS computer program input for thermal evaluations provided in SAR Chapter 4.
- (8) This information should be held in confidence because it provides details of materials qualification programs that were developed at significant expense. This information has substantial commercial value to Transnuclear in connecting with competition with other vendors for contracts.

The subject information could only be duplicated by competitors if they were to invest time and effort equivalent to that invested by Transnuclear provided they have the requisite talent and experience.

Public disclosure of this information is likely to cause substantial harm to the competitive position of Transnuclear, because it would simplify design and evaluation tasks without requiring a commensurate investment of time and effort.