

A
TRANSNUCLEAR

71-9233

E-22054
March 8, 2005

Ms. Jessica Umana
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike M/S 013-D13
Rockville, MD 20852

Subject: Transnuclear Model No. TN-RAM, Docket number 71-9233
TAC No. L29023

Reference: Request for Renewal, TN letter E-21776

Dear Ms. Umana:

Per your request, enclosed is a consolidated Safety Analysis Report (SAR) for the TN-RAM packaging. The consolidated SAR includes supplements from January 1988 through August 1998 and is currently at the revision 7 level.

This submittal includes proprietary information which consists of certain design drawings and a lead pouring procedure. In accordance with 10 CFR 2.390, an affidavit is enclosed for withholding the proprietary information from public disclosure. The proprietary information is so identified and provided as a separate enclosure.

If you have any questions, please contact me.

Sincerely,



Michael Mason
Chief Engineer

Enclosures: as stated above

NMSSO/

AFFIDAVIT

STATE OF NEW YORK

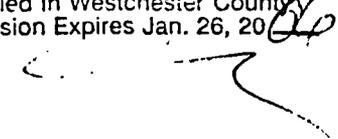
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COUNTY OF WESTCHESTER

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 4 day
of April, 2005.

ANNE MARIE CLEARY
Notary Public, State of New York
No. 01CL6001814
Qualified in Westchester County
Commission Expires Jan. 26, 2006


- (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 2.390 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 2.390(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 or referenced in the Safety Analysis Report for the TN-RAM. Specifically, Transnuclear drawings and a manufacturing procedure:
- a) Transnuclear drawings 990-702 through 990-708.
 - b) Lead Pouring Procedure E-10615
- (8) This information should be held in confidence because it provides details of design and manufacturing. 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.