



February 3, 2006
NUH03-06-14

Mr. Joe Sebrosky
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike M/S 0-6-F-18
Rockville, MD 20852

Subject: Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS[®] Horizontal Modular Storage System For Irradiated Nuclear Fuel, Revision 9.

- References:**
1. Letter from Mr. Robert A. Nelson to Mr. U. B. Chopra, Dated December 5, 2005, "Amendment No. 8, Certificate of Compliance No. 1004 for the Standardized NUHOMS[®] System (TAC No. L23929)".
 2. FSAR for the Standardized NUHOMS[®] Horizontal Modular Storage System For Irradiated Nuclear Fuel, Revision 8, June 2004.

Dear Mr. Sebrosky:

As requested in Reference 1, Transnuclear, Inc., (TN) has updated Reference 2 and herewith submits the subject UFSAR Revision 9 for docketing. This update to the UFSAR incorporates changes to the NUHOMS[®] system recently authorized by Amendment No. 8 to CoC 1004.

Revision 9 of the UFSAR also incorporates changes implemented by TN under the 72.48 rule following the docketing of Reference 2, including 72.48 changes implemented through November 2005.

To maintain clarity, Amendment 8 changes which affected current UFSAR Appendices M and N, complete Chapters M1, M2, M5, and M6 of Appendix M, and Chapters N2, N5, and N6 of Appendix N are provided herewith for replacement, including Master Table of Contents. Also included are new Appendices P and R. All other pages are on a replacement page basis. Please note that changes in FSAR Appendix P pages implemented per Reference 1 are identified with a single revision bar on the right side of the page, while the 10CFR72.48 changes are shown with a double revision bar.

TN is separately submitting a summary description of all 72.48 changes and supporting evaluations implemented since submittal of Reference 2 as required per 72.48(d)(2).

This submittal includes proprietary information. In accordance with 10CFR2.390, we are providing an affidavit specifically requesting that you withhold this proprietary information from public disclosure.

Mr. Joe Sebrosky
Spent Fuel Project Office, NMSS

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Please contact me at 510-744-6053 or Mr. Jayant Bondre at 410-910-6881 if you require any additional information in support of this submittal.

Sincerely,



U. B. Chopra
Licensing Manager

Docket 72-1004

- Enclosures:
1. 10 CFR 2.390 Affidavit.
 2. Five (5) copies of the Replacement Pages of the Standardized NUHOMS[®] UFSAR Revision, 9 (Proprietary version).
 3. One (1) copy of the Replacement Pages of the Standardized NUHOMS[®] UFSAR, Revision 9 (Non-Proprietary version).

CC: Mr. Ray Wharton
Spent Fuel Project Office
U. S. Nuclear Regulatory Commission

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

Transnuclear, Inc.)
State of California) SS.
County of Alameda)

I, Jayant Bondre, depose and say that I am the Director Of Engineering and Licensing 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 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosure 2 and as listed below:

- 1. Proprietary version of the Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS[®] Horizontal Modular Storage System For Irradiated Nuclear Fuel, Revision 9 (5 copies).

This document has been appropriately designated as proprietary.

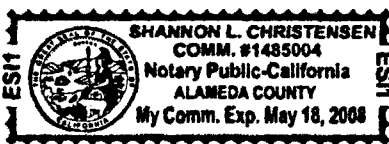
I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

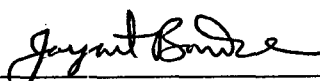
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure are the design drawings of the NUHOMS[®] Cask, and supporting analysis 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 2.390 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.




Jayant Bondre
Director of Engineering and Licensing, Transnuclear, Inc.

Subscribed and sworn to me before this 3rd day of February, 2006, by Jayant Bondre.


Notary Public