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# CENG

a joint venture of



Constellation  
Energy



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## CALVERT CLIFFS NUCLEAR POWER PLANT

March 31, 2010

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** Calvert Cliffs Nuclear Power Plant  
Independent Spent Fuel Storage Installation; Docket No. 72-8  
Supplemental Information Related to License Amendment Request No. 9  
(TAC No. L24350)

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**REFERENCE:** (a) Letter from Mr. J. A. Spina (CCNPP) to Document Control Desk (NRC), dated June 15, 2009, License Amendment Request : Allow Increased Burnup Fuel to be Loaded into NUHOMS-32P Dry Shielded Canister

Calvert Cliffs submitted a license amendment request (Reference a) to allow the loading of increased burnup fuel into a NUHOMS-32P Dry Shielded Canister. The Nuclear Regulatory Commission (NRC) staff conducted a phone call with Calvert Cliffs staff on January 5, 2010 to discuss the need for revised structural calculations to be performed to support their review of Reference (a). Specifically, the NRC staff indicated that end drop structural calculations for both the fuel and the canister using LS-DYNA (a finite element analysis code) would need to be provided. The requested calculations are attached [Attachments (1), (2) and (3)].

One of the Transnuclear, Inc. calculations [Attachment (3)] contains information that is proprietary to Transnuclear, Inc. Therefore, it is accompanied by an affidavit [Attachment (4)] signed by Transnuclear, Inc., the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission, and addresses, with specificity, the considerations listed in 10 CFR 2.390(b)(4). Accordingly, it is requested that the information proprietary to Transnuclear, Inc. be withheld from public disclosure. A non-proprietary version of the calculation is provided [Attachment (2)] for public disclosure.

This supplemental information does not change the environmental assessment provided in Reference (a) and the categorical exclusion set forth in 10 CFR 51.22(c)(11) is still valid.

A001  
NM55

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,



STATE OF MARYLAND :  
  : TO WIT:  
COUNTY OF CALVERT :

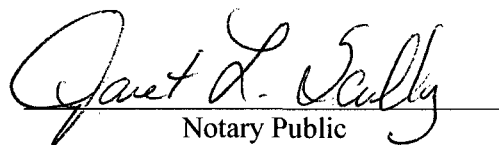
I, George H. Gellrich, being duly sworn, state that I am Vice President - Calvert Cliffs Nuclear Power Plant, LLC (CCNPP), and that I am duly authorized to execute and file this License Amendment Request on behalf of CCNPP. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other CCNPP employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Mary's, this 31<sup>st</sup> day of March, 2010.

**WITNESS** my Hand and Notarial Seal:

My Commission Expires:

  
Notary Public

March 1, 2011  
Date

GHG/PSF/bjd

cc: J. M. Goshen, NMSS (including DVDs with files as listed in Enclosures 1 and 2)

**(Without Attachment 3)**

D. V. Pickett, NRC  
S. J. Collins, NRC  
Resident Inspector, NRC

S. Gray, DNR  
M. F. Weber, NMSS  
V. L. Ordaz, NRC

- Attachments:
- (1) NUH32P+.0203, Revision 0, 32P+ Transfer Cask Impact onto the Concrete Pad LS-DYNA Analysis (80 inch end drop)  
Enclosure: (1) The file listing for Three DVDs Containing LS-DYNA Files for NUH32P+.0203
  - (2) NUH32P+.0204, Revision 0, Fuel End Drop Analysis for NUH32P+ Using LS-DYNA, Non-proprietary Version
  - (3) NUH32P+.0204, Revision 0, Fuel End Drop Analysis for NUH32P+ Using LS-DYNA, Proprietary Version  
Enclosure: (2) The file listing for One DVD Containing LS-DYNA Files for NUH32P+.0204
  - (4) Proprietary Affidavit for NUH32P+.0204, Revision 0

**ATTACHMENT (4)**

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**PROPRIETARY AFFIDAVIT FOR NUH32P+.0204, REVISION 0**

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**AFFIDAVIT PURSUANT  
TO 10 CFR 2.390**

Transnuclear, Inc.                    )  
State of Maryland                )    SS.  
County of Howard                )

I, Jayant Bondre, depose and say that I am Vice President of Transnuclear, Inc., duly authorized to execute 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 1 and as listed below:

- TN Calculation NUH32P+.204, Revision 0

This document has been appropriately designated as proprietary.

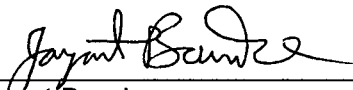
I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a proprietary trade secret, privileged or as confidential commercial or financial information.

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 documents, should be withheld.

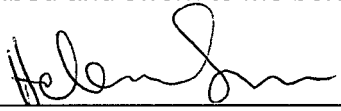
- 1) The information sought to be withheld from public disclosure involves structural calculations of the NUHOMS 32P+ canister which are owned and have been held in confidence by Transnuclear, Inc.
- 2) The information is of a type customarily held in confidence by Transnuclear, Inc. and not customarily 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. and to other owners of the information because:
  - a) A similar product is manufactured and sold by competitors of Transnuclear, Inc.

- b) Development of this information by Transnuclear, Inc. and other owners of the information 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 transportation 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 structural calculations related to the design and analysis of dry spent fuel storage systems, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to unfairly get a better competitive position with Transnuclear, Inc., take marketing or other actions to improve their product's position or impair the position of Transnuclear, Inc.'s product, while avoiding the expense of 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.

  
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 Jayant Bondre  
 Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 8<sup>th</sup> day of March 2010.

  
 \_\_\_\_\_  
 Notary Public

My Commission Expires \_\_\_\_\_

