



June 9, 2011
E-31030

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Transnuclear, Inc. (TN) Application for the TN-40 Transportation Packaging for Spent Fuel, Revision 16, Docket No. 71-9313, TAC No. L24106

Based on discussions with the NRC Staff, changes have been made to the TN-40 Transportation Application Safety Analysis Report (SAR) to clarify the type of neutron absorber material and the irradiation history regarding the maximum average soluble boron concentration.

Enclosure 1 provides instructions for SAR page removal and insertion. The changed SAR pages are provided herein as Enclosures 2 and 3, for the proprietary and non-proprietary SAR versions, respectively. Enclosure 4 provides a listing of the computer files contained on Enclosure 5. The computer files associated with the criticality analysis are provided on a CD as Enclosure 5. The affidavit pursuant to 10 CFR 2.390 is provided in Enclosure 6.

Should the NRC staff require additional information to support review of this application, please do not hesitate to contact Mr. Kamran Tavassoli at 410-910-6944 or me at 410-910-6881.

Sincerely,

Jayant Bondre, PhD
Vice President - Engineering

cc: Huda Akhavannik, Meraj Rahimi (NRC SFST)

- Eight copies of this cover letter and Enclosures 1, 2, 4, and 6
- One copy of Enclosure 5

Enclosures:

1. TN-40 Revision 16 SAR Page Replacement Instructions
2. Changed Pages for the TN-40 Application Safety Analysis Report, Revision 16, Proprietary Version
3. Changed Pages for the TN-40 Application Safety Analysis Report, Revision 16, Non-proprietary Version
4. Listing of Disk Numbering and Contents for Computer Files Contained on Enclosure 5
5. Computer Files Associated with Criticality Analysis on a CD (Proprietary)
6. Affidavit Pursuant to 10 CFR 2.390

Enclosure 1 to TN E-31030

TN-40 Revision 16 SAR Page Replacement Instructions

Proprietary Version

Old page	Revision 16 Replacement Page
Cover	Cover
6-23	6-23
6-24	6-24
6-25	6-25
6-38	6-38
6-78	6-78
6-79	6-79
6-80	6-80

Non-proprietary Version

Old page	Revision 16 Replacement Page
Cover	Cover

Enclosure 3 to TN E-31030

**Changed Pages for the TN-40 Application Safety Analysis
Report, Revision 16, Non-proprietary Version**

NON-PROPRIETARY



AREVA

TRANSNUCLEAR, INC.

TN-40

TRANSPORTATION PACKAGING

SAFETY ANALYSIS REPORT

Revision 16
June 2011

7135 Minstrel Way, Suite 300 • Columbia, MD 21045

Enclosure 4 to TN E-31030

**Listing of Disk Numbering and Contents for Computer Files
Contained on Enclosure 5**

Disk ID No. (size)	Discipline	System/Component	File Series (topics)	Number of files
Enclosure 5 One CD Nuclear Folder (4.14 MB)	Criticality	TN-40 Criticality Analysis for Boron Letdown Sensitivity	001- letdown1 – Directory	6
Enclosure 5 One CD Nuclear Folder (2.82 MB)	Criticality	TN-40 Criticality Analysis for BORAL Poison Sensitivity	002- BORAL1 – Directory	4

Description of the files:

File	Description
001 – letdown1	CSAS25 Files
b31c-fpc3.inp	Input File TN-40 DB Model (600 ppm constant boron)
b31c- fpc3.out	Output File TN-40 TN-40 DB Model (600 ppm constant boron) k-eff = 0.9362, Table 6-16
b31c- boron1.inp	Input File TN-40 DB Model, 600 ppm average linear boron letdown
b31c- boron1.out	Output File TN-40 DB Model, 600 ppm average linear boron letdown k-eff = 0.9374, Table 6-16
b31c-boron2-25-isotopes.inp	Input File TN-40 DB Model, 675 ppm average non-linear boron letdown
b31c-boron2-25-isotopes.out	Output File TN-40 DB Model, 675 ppm average non-linear boron letdown k-eff = 0.9373, Table 6-16
002 – BORAL1	CSAS25 Files
e355b300c30-bprno-Boral.inp	Input File TN-40 DB Model (3.55 wt. % U-235, 30.0 GWD/MTU in burnup, without BPRAs)
e355b300c30-bprno-Boral.out	Output File TN-40 TN-40 DB Model (3.55 wt. % U-235, 30.0 GWD/MTU in burnup, without BPRAs) k-eff = 0.9085, Table 6-16a
e285b235c30-bpr-Boral.inp	Input File TN-40 DB Model (2.85 wt. % U-235, 23.5 GWD/MTU in burnup, with BPRAs)
e285b235c30-bpr-Boral.out	Output File TN-40 TN-40 DB Model (2.85 wt. % U-235, 23.5 GWD/MTU in burnup, with BPRAs) k-eff = 0.9096, Table 6-16a

Enclosure 5 to TN E-31030

**Computer Files Associated with Criticality Analysis on a CD
(Proprietary)**

**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 a 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 2 and 5 and is listed below:

- Portions of TN-40 Transport Cask Safety Analysis Report Chapter 6
- Input and output files for criticality study

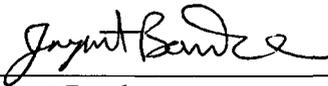
These documents have been appropriately designated as proprietary.

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 2.390 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 involves certain portions of the safety analysis report and the computer files associated with the criticality analysis related to the design of the TN-40 transportation cask, 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) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because the information consists of descriptions of the design of dry spent fuel transportation 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 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.

Further the deponent sayeth not.



Jayant Bondre
Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 9th day of June, 2011.



Notary Public

My Commission Expires _____
Lauren McKee
NOTARY PUBLIC
Anne Arundel County, Maryland
My Commission Expires 2/12/2015

