

May 27, 2011 E-31013

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 15, 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 used.

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,

Javant Bondre, PhD

Vice President - Engineering

CC:

Huda Akhavannik, Meraj Rahimi (NRC SFST) (8 copies of this cover letter and

Enclosures 1 and 2, provided in a separate mailing)

Enclosures:

- 1. TN-40 Revision 15 SAR Page Replacement Instructions
- 2. Changed Pages for the TN-40 Application Safety Analysis Report, Revision 15, Proprietary Version
- 3. Changed Pages for the TN-40 Application Safety Analysis Report, Revision 15, Non-proprietary Version
- 4. Listing of Disk Numbering and Contents for Computer Files Contained on Enclosure 5 CD (all files are Proprietary)
- 5. Computer Files Associated with Criticality Analysis on a CD (Proprietary)
- 6. Affidavit Pursuant to 10 CFR 2.390

Enclosure 1 to TN E-31013

TN-40 Revision 15 SAR Page Replacement Instructions

Proprietary Version

Old page	Revision 15 Replacement Page
Cover	Cover
Drawings	
10421-71-1, Rev. 4	10421-71-1, Rev. 5

Non-proprietary Version

Old page	Revision 15 Replacement Page
Cover	Cover
Drawings	
10421-71-1, Rev. 4	10421-71-1, Rev. 5

Enclosure 3 to TN E-31013

Changed Pages for the TN-40 Application Safety Analysis Report, Revision 15, Non-proprietary Version

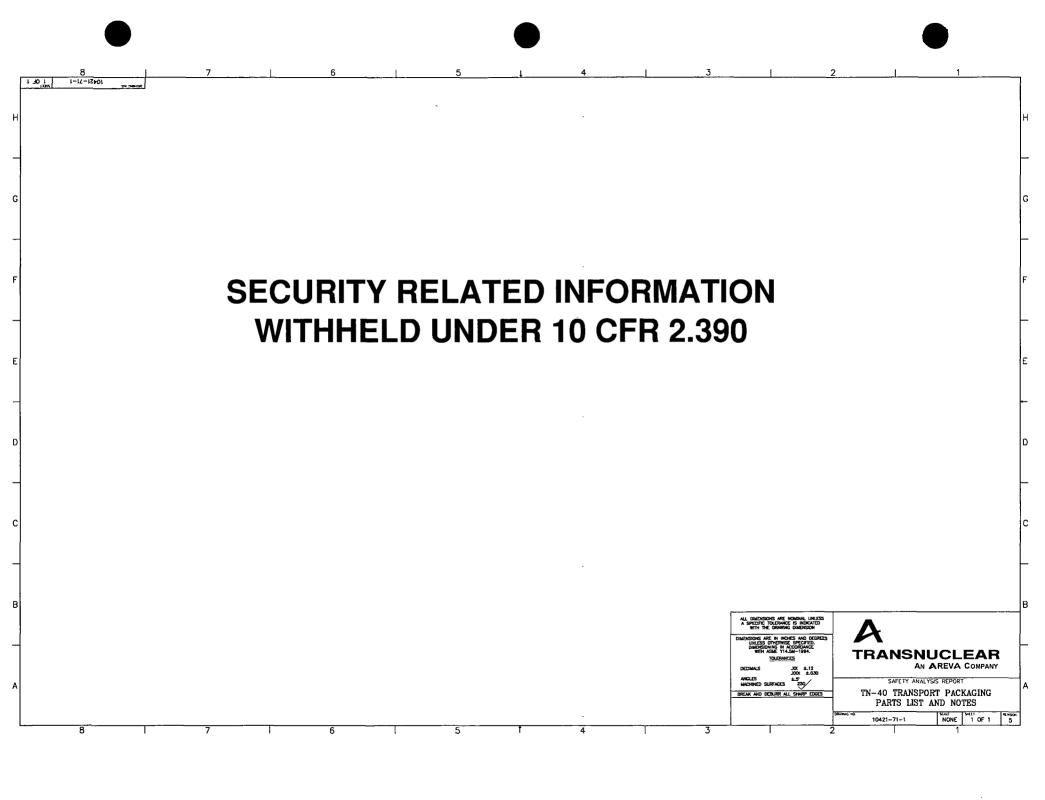
NON-PROPRIETARY

AREVA TRANSNUCLEAR, INC.

TN-40 TRANSPORTATION PACKAGING

SAFETY ANALYSIS REPORT

Revision 15 May 2011



Enclosure 4 to TN E-31013

Listing of Disk Numbering and Contents for Computer Files Contained on Enclosure 5 CD (all files are Proprietary)

Disk ID No. (size)	Discipline	System/Component	File Series (topics)	Number of files
Enclosure 05		TN-40 Criticality Analysis	001- BORAL – Directory	
One CD		for Poison Material Sensitivity	TN-40 Boral, Criticality Analysis	4
Nuclear Folder	Criticality			
(34.66 MB)		TN-40 Criticality Analysis for Depletion with Boron Letdown	002-LETDOWN – Directory	
			TN-40 Boron Letdown, Depletion Analysis	4

Description of the files:

File	Description
001 - BORAL	CSAS25 Files
box_min_o100_gaps.inp	Input File TN-40 Criticality Borated Aluminum Poison
box_min_o100_gaps.out	Output File TN-40 Criticality Borated Aluminum Poison
box_min_o100_gaps_boral.inp	Input File TN-40 Criticality BORAL Poison
box_min_o100_gaps_boral.out	Output File TN-40 Criticality BORAL Poison
002 - LETDOWN	SAS2H Files
	SAS2H Input File TN-40 - Depletion Linear Average 600 PPM -
boron1-31z00.inp	Assembly Average Burnup
	SAS2H Output File TN-40 - Depletion Linear Average 600 PPM -
boron1-31z00.out	Assembly Average Burnup
	SAS2H Input File TN-40 - Depletion Non-Linear Average 675 PPM
boron2-31z00.inp	- Assembly Average Burnup
	SAS2H Output File TN-40 - Depletion Non-Linear Average 675
boron2-31z00.out	PPM - Assembly Average Burnup

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 1 (Drawing 10421-71-1)
- Input and output files for poison material sensitivity 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 safety analysis report drawings 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.

layant Bondre

Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 27th day of Mery 2011

My Commission Expires 5