

<b>NRC FORM 7</b> (8-2011) 10 CFR 110		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3160-0027		EXPIRES: 08/31/2012	
<b>APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S)</b> (See Instructions on Pages 4 and 5)				Estimated burden per response to comply with this mandatory collection request 24 hours. This submission is reviewed to ensure that the applicable statutory, regulatory and policy considerations are satisfied. Send comments regarding burden estimate to the Information Services Branch (1-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NE0B-10202, (3150-0027) Office of Management and Budget, Washington, DC 20503 if a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.			
<b>PART A. FOR NRC USE ONLY</b>		<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC		DATE RECEIVED: <b>MAR 27 2012</b> <i>Rec'd JC</i>			
LICENSE NUMBER: <b>XCOM 1244</b>		DOCKET NUMBER: <b>11005998</b>		ADAMS ACCESSION NUMBER:			
<b>PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS</b> (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)							
1 NAME AND ADDRESS OF APPLICANT/LICENSEE Transco Products Inc. 55 E. Jackson Blvd. Suite 2100 Chicago, IL 60604-4166			1a NAME OF APPLICANT'S CONTACT Edward Wolbert		1b APPLICANT'S REFERENCE NUMBER RV-50666		
			1c PHONE NUMBER (312) 896-8501		1d FAX NUMBER (312) 427-4975		
			1e E-MAIL ADDRESS edwolbert@transcoproducts.com				
2. TYPE OF ACTION REQUESTED (Check One)							
<input checked="" type="checkbox"/> EXPORT (Parts B, C, E)		<input type="checkbox"/> IMPORT (Parts B, D, E)		<input type="checkbox"/> AMENDMENT/RENEWAL Current License Number:		<input type="checkbox"/> CONSENT REQUEST (Parts B, C) Current License Number:	
3. CONTRACT NUMBER(S) 11-PT-0081		4. FIRST SHIPMENT DATE 09/07/2012		5. LAST SHIPMENT DATE 03/29/2013		6. PROPOSED EXPIRATION DATE 12/31/2013	
<b>PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, RENEWALS OR CONSENTS</b> (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)							
7 NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT Shanghai Electric E&A Industrial Development Co., Ltd 9B, 212 Jiang Ning Road, Shanghai 200041, P.R. China Attn: Erin Hu +86.21.5289.5656 Ext. 826			8 NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S) Shanghai Electric Nuclear Power Equipment Co, Ltd. No. 77 Cengling Road, Lingang Heavy Industry Area, Pudong New Area, Shanghai, P.R. China (201306) Attn: Mr. Jin Feng +86.21.3822.0391 jinfeng@shanghai-electric.com			9 NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S) CNNC Hainan Nuclear Power Co., Ltd 1 Binmao road, Longhua District, Haikou City, Hainan Province 570105 Attn: Mr. Wang Ji +86.898.3676.3541 1D@hnpc.cc	
7a FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED Contracting Entity			8a INTERMEDIATE USE(S) Technical Approvals			9a ULTIMATE END USE(S) Thermal Insulation for RPV	
10 DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES EQUIPMENT, OR COMPONENTS FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT Thermal Insulation composed of stainless steel sheet metal and foil used on the reactor vessel at Changjiang Units 1 & 2. The total export amount is approximately <b>[REDACTED]</b> Total Weight: 2200 KGS 160 CBM				10a MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)		10b MAX ENRICHMENT OR WGT % N/A	10c MAX ISOTOPE WGT (KG) N/A
11 FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) Not Applicable							

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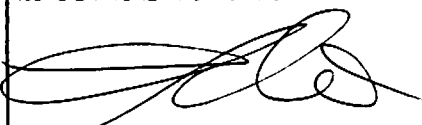
APPLICATION FOR NRC EXPORT OR IMPORT  
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER XC0M 1244	DOCKET NUMBER 1100, 5998	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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**PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS**  
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12 NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT	13 NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)	14 NAME(S) / ADDRESS(ES) OF ULTIMATE U S CONSIGNEE(S)	
12a NRC EXPORT LICENSE NUMBER(S) (if applicable)	13a LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a LICENSE NUMBER(S) / EXPIRATION DATE(S)	
	13b INTERMEDIATE USE(S)	14b ULTIMATE END USE(S)	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES	15a MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %	15c MAX ISOTOPE WGT (KG)
16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)			

**PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)**

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
18. CERTIFICATION: I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.		
18a PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL Edward J. Wolbert President/CEO	18b SIGNATURE - AUTHORIZED OFFICIAL 	18c DATE 3/13/12

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APPLICATION FOR NRC EXPORT OR IMPORT  
LICENSE, AMENDMENT, RENEWAL OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER: XC 0M 1244	DOCKET NUMBER: 1100 5 998	ADAMS ACCESSION NUMBER:	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

N/A

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Transco Products Inc.

Edward J. Wolbert | President & CEO  
edwolbert@transcoproducts.com

10 C.F.R. 110.31

**CONFIDENTIAL COMMERCIAL INFORMATION/  
SUBMITTED UNDER 10 C.F.R. 2.390 / FOIA EXEMPT**

March 13, 2012

Deputy Director, Office of International Programs  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, MD 20852

**Re: Application for Specific License for Export of Metal Reflective Insulation to China**

Dear Deputy Director:

Transco Products Inc. ("TPI") hereby requests a specific license under 10 C.F.R. 110.31 from the NRC for the export of metal reflective insulation ("MRI") to China. TPI is currently under contract to supply MRI to a customer in China for use at a commercial nuclear power plant.

Specifically, TPI is under contract to supply MRI, which is composed of stainless steel sheet metal and foil, for use on the reactor vessel at the Changjiang Nuclear Power Plant, Units 1 & 2, which are under construction in China. The initial anticipated shipment would be in September 2012, and activities would involve delivery of the material and providing a technical representative. At some point thereafter, TPI would return to install the product.

As summarized in TPI's "Supplemental Information from Transco Products, Inc. Regarding its Voluntary Self-Disclosure," which was submitted to the NRC on February 1, 2012, TPI previously understood that MRI was subject to the Department of Commerce's export control regulations and not the NRC's export control regulations. In a December 23, 2011 letter to TPI, the NRC explained that TPI's MRI is subject to the NRC's Part 110 regulations. As a result of the December 23, 2011 letter from the NRC, TPI is now submitting this license request for China.

As we understand, the proposed export falls under the fee schedule set forth in 10 C.F.R. 170.21(K)(2). A check in the amount of \$9,600 is enclosed to cover the appropriate fee. A completed NRC Form 7, which is required under 10 C.F.R. 110.31(b), is attached as Attachment 1.

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**TRANSCO PRODUCTS INC.**

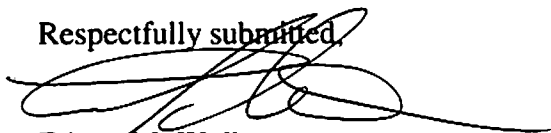
**CONFIDENTIAL COMMERCIAL INFORMATION/  
SUBMITTED UNDER 10 C.F.R. 2.390 / FOIA EXEMPT**

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Attachment 1 contains confidential commercial information within the meaning of Exemption 4 of the Freedom of Information Act (5 U.S.C. § 552(b)(4)) and 10 C.F.R. 2.390. Accordingly, TPI requests that the portion of Form 7 identified in brackets be withheld from public disclosure pursuant to Exemption 4 of FOIA and Section 2.390 of the NRC's regulations. The supporting affidavit required by Section 2.390 is contained in Attachment 2.

Should you have any questions or comments concerning this request, please do not hesitate to contact me at (312) 896-8501.

Respectfully submitted,



Edward J. Wolbert  
President/CEO  
Transco Products Inc.

Cc: Ms. Brooke Smith, Nuclear Regulatory Commission  
Ms. Jill Shepherd-Vladimir, Nuclear Regulatory Commission

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Transco Products Inc.

## AFFIDAVIT

I, Edward J. Wolbert, hereby affirm and state as follows:

- (1) I am the President and CEO of Transco Products Inc. ("TPI"), and I have been authorized to execute this affidavit on behalf of TPI.
- (2) I am submitting this affidavit in accordance with the U.S. Nuclear Regulatory Commission's ("NRC") regulations at 10 C.F.R. § 2.390 in conjunction with an NRC specific export license application.
- (3) In accordance with 10 C.F.R. § 2.390, it is requested that the dollar amounts set forth for in Block 10 on page 1 of the NRC Form 7, which is contained in Attachment 1 to this transmittal, be withheld from public disclosure. The information is identified in brackets.
- (3) In making this application for withholding of proprietary information of which it is the owner, TPI believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. Section 1905, and NRC regulations 10 CFR 9.17(a)(4) and 2.390(a)(4) for trade secrets and commercial or financial information because:
  - i. This information is and has been held in confidence by TPI.
  - ii. This information is of a type that is customarily held in confidence by TPI, and there is a rational basis for doing so because the information contains sensitive pricing information about TPI's product.
  - iii. The information is being transmitted to the NRC voluntarily and in confidence.
  - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - v. Public disclosure of this information would create substantial harm to the competitive position of TPI by disclosing pricing information about TPI's product. Development and evaluation of this proprietary information was achieved at a significant cost to TPI, and disclosure could lead to additional significant cost or competitive harm to TPI.
  - vi. Public disclosure of the information sought to be withheld is likely to cause substantial harm to TPI's competitive position and foreclose or reduce the availability of profit-making opportunities. The value of the information goes beyond the disclosure of actual information pertaining to TPI's pricing information, and includes substantial time and work in cultivating the customer and analyzing competitive market prices for TPI's product.
  - vii. TPI's competitive advantage will be lost if its competitors are able to use the results of TPI's activities to aid their own commercial activities. The value of this information to TPI would be damaged if the information were disclosed to

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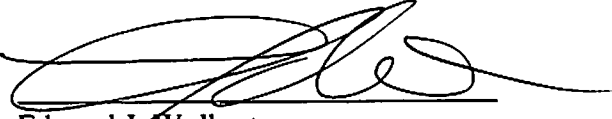
# TRANSCO PRODUCTS INC.

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the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive TPI of the opportunity to exercise its competitive advantage to seek an adequate return on its significant investment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 13, 2012.



Edward J. Wolbert

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MAR 27 2012  
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