Calvert Cliffs Nuclear Power Plant, LLC 1650 Calvert Cliffs Parkway Lusby, Maryland 20657 410.495.5200 410.495.3500 Fax



March 29, 2012

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 re: License Amendment Request: High Burnup NUHOMS®-32PHB Dry Shielded Canister and Horizontal Storage Modules

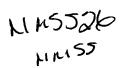
REFERENCE:

(a) Letter from G. H. Gellrich (CCNPP) to Document Control Desk (NRC), dated December 8, 2011, License Amendment Request: High Burnup NUHOMS®-32PHB Dry Shielded Canister and Horizontal Storage Modules

Reference (a) provided a license amendment request that reflects the necessary Technical Specification changes to implement use of Nutech Horizontal Modular Storage (NUHOMS®)-32PHB canisters, and the associated transporter and horizontal storage modules. In discussion with the Nuclear Regulatory Commission (NRC) staff reviewing the request, it was brought to our attention that the enclosures provided with the original submittal were not printed in color, thereby making some of the figures difficult to read. Therefore, we are providing color copies of Enclosures 1-10.

Enclosures 1 and 6 are Transnuclear, Inc. calculations that contain information that is proprietary to Transnuclear, Inc. Therefore, they are accompanied by an affidavit [Attachment (1)] 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. Non-proprietary versions of these two calculations are provided in Enclosures 9 and 10 for public disclosure.

Additionally, we note that the cover letter originally submitted may not have clearly characterized the nature or our request. We are requesting approval of the Technical Specification changes described in Reference (a). The other aspects of the canister design, the associated transporter, and the horizontal storage modules are evaluated in accordance with the requirements of 10 CFR 72.48 and no design



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aspects have been identified that require prior NRC approval before implementation. Please disregard any statements that imply or state that we are requesting approval of the canister design, transporter design, or horizontal storage module design.

The information provided here does not change the environmental assessment or the technical basis provided in Reference (a).

We apologize for any inconvenience that these issues may have caused.

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 public in and for the State of Maryland and County of St. Mary public in and for the State of Maryland and County of St. Mary public in and for the State of Maryland and County of St. Mary public in and for the State of Maryland and County of St. Maryland and County o

WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires:

Date

GHG/PSF/bjd

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Attachment:

(1) Transnuclear, Inc. Proprietary Affidavit

Enclosures:

- 1. Proprietary TN Calculation NUH32PHB-0503, HSM-HB Shielding Analysis for NUHOMS 32PHB System
- 2. TN Calculation NUH32PHB-0600, Criticality Evaluation for NUHOMS 32PHB System
- TN Calculation NUH32PHB-0603, USL Evaluation for NUHOMS 32PHB System
- 4. TN Calculation NUH32PHB-0408, Thermal Analysis of NUHOMS 32PHB DSC for Vacuum Drying Operations
- 5. TN Calculation NUH32PHB-0406, Thermal Evaluation of NUHOMS 32PHB Transfer Cask for Normal, Off Normal, and Accident Conditions (Heat Loads <29.6kW)
- Proprietary TN Calculation NUH32PHB-0401, Thermal Evaluation of NUHOMS 32PHB Transfer Cask for Normal, Off Normal, and Accident Conditions with Forced Cooling (Steady State)
- 7. TN Calculation NUH32PHB-0402, Thermal Evaluation of NUHOMS 32PHB Transfer Cask for Normal, Off-Normal, and Accident Conditions
- 8. TN Calculation NUH32PHB-0212, CCNPP-FC Transfer Cask Structural Evaluation Accident Conditions, 75G Side Drop and 75G Top End Drop Cases
- 9. Non-Proprietary TN Calculation NUH32PHB-0503, HSM-HB Shielding Analysis for NUHOMS 32PHB System
- Non-Proprietary TN Calculation NUH32PHB-0401, Thermal Evaluation of NUHOMS 32PHB Transfer Cask for Normal, Off Normal, and Accident Conditions with Forced Cooling (Steady State)

cc: (Without Enclosures)

D. V. Pickett, NRCW. M. Dean, NRCResident Inspector, NRC

S. Gray, DNR C. Haney, NMSS V. L. Ordaz, NMSS

ATTACHMENT (1)

TRANSNUCLEAR, INC. PROPRIETARY AFFIDAVIT				

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 following documents as listed below:

- 1. TN Calculation NUH32PHB-0401, "Thermal Evaluation of NUHOMS 32PHB Transfer Cask for Normal, Off Normal, and Accident Conditions with Forced Cooling (Steady State)," Revision 1.
- 2. TN Calculation NUH32PHB-0503, "HSM-HB Shielding Analysis for NUHOMS 32PHB System," Revision 1.

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 are certain portions of thermal evaluation and radiation dose rate analyses for NUHOMS[®] 32PHB dry storage system 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.
- 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 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 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.

My Commission Expires Johns Out The County Public

Vice President, Transnuclear, Inc.

Subscribed and swom to me before this 15th day of November, 2011.

M. DOUGHARY

MOYARY Public

NOTARY

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