



September 18, 2012
E-33555

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

Subject: Submittal of Test Reports Referenced in the Safety Analysis Report for TN-LC
Transportation Package (Docket No. 71-9358; TAC No. L24543)

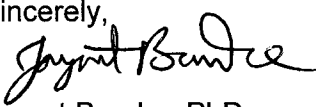
Reference: Request from Pierre Saverot (NRC) in Email to Kamran Tavassoli (TN)

Pursuant to a request from Mr. Pierre Saverot, SFST Project Manager, I am submitting copies of the test reports used as references 3 and 6 in Appendix 2.13.12 of the Safety Analysis Report (SAR) for TN-LC Transportation Package.

These test reports provided in Enclosures 1 and 2 include proprietary information that may not be used for any purpose other than to support NRC staff review of the application. Enclosure 3 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that you withhold proprietary information included in Enclosures 1 and 2 of this letter from public disclosure.

It should be noted that the report provided in Enclosure 2 was previously submitted to NRC as Enclosure 12 to TN letter E-32623 in response to the first round of RAI questions for TN-LC Transportation Package application.

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

cc: Pierre Saverot, Project Manager, NRC SFST

NMSSDI

Enclosures:

1. JE Pantalone of Baltek Corp to TJ Neider of Transnuclear, "TN-GEMINI Balsa Impact Limiter," 1987 (Proprietary)
2. Gammon, B. W. and W. A. Dost, "Compression Tests of Redwood Samples," Forest Product Laboratory, University of California, Berkeley, 1985 (Proprietary)
3. Affidavit Pursuant to 10 CFR 2.390

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 Enclosures 1 and 2 and is listed below:

- Enclosure 1 - JE Pantalone of Baltek Corp to TJ Neider of Transnuclear, "TN-GEMINI Balsa Impact Limiter," 1987
- Enclosure 2 - Gammon, B. W. and W. A. Dost, "Compression Tests of Redwood Samples," Forest Product Laboratory, University of California, Berkeley, 1985

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 test reports associated with certain SAR analyses related to the design of the TN-LC transportation package, 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 is related to the design of transportation package, the application of which provides 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.

**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 Enclosures 1 and 2 and is listed below:

- Enclosure 1 - JE Pantalone of Baltek Corp to TJ Neider of Transnuclear, “TN-GEMINI Balsa Impact Limiter,” 1987
- Enclosure 2 - Gammon, B. W. and W. A. Dost, “Compression Tests of Redwood Samples,” Forest Product Laboratory, University of California, Berkeley, 1985

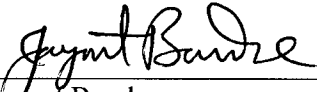
These documents have been appropriately designated as proprietary.

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.

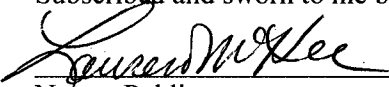
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission’s regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves test reports associated with certain SAR analyses related to the design of the TN-LC transportation package, 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 is related to the design of transportation package, the application of which provides 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 18th day of September, 2012.


Notary Public

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

