



June 8, 2011

U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Spent Fuel Storage and Transportation
Mail Stop EBB-3D-02M, Pierre Saverot, Project Manager
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Ref: Docket# 71-9316

Dear Mr. Saverot:

Alpha-Omega Services, Inc. (AOS) hereby submits 3 hard copies of the "Alpha Omega Services Cask Project Helicoflex Seal Temperature Limits" This revision incorporates our responses to the 2nd round of RAIs, received on March 22, 2011. AOS considers this document to be proprietary and requested that this document be withheld from the Public Document Room and has attached an affidavit for withholding this information as required by 10CFR2.390.

Please contact us if you need additional information or have comments regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy Hedger", is written over a horizontal line.

Troy Hedger, CEO
Alpha-Omega Services, Inc.



Alpha-Omega Services, Inc.
Supplementary Affidavit

June 8, 2011

I, Troy Hedger, being duly sworn, depose and state as follows:

1. I am the CEO of Alpha-Omega Services, Inc. and have been delegated the function of reviewing the information described in paragraph 2, which is sought to be withheld, and have been authorized to apply for its withholding.
2. The information sought to be withheld consists of Garlock Helicoflex Report, Helicoflex Seal Temperature Limit for Alpha Omega Services Cask Project.
3. In designating material as proprietary, Alpha-Omega Services, Inc. utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it...A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information...Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by his employees and others involved in this business; (3) the extent of measures taken by him to guard the secrecy of the Information; (4) the value of the information to him and his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that discloses an apparatus where prevention of its use by Alpha-Omega Services' competitors without license from Alpha-Omega Services constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure on resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
 - c. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
5. Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the

- company is limited on a “need to know” basis, and such documents at all times are clearly identified as proprietary.
6. The procedure for approval of external release of such a document is reviewed by higher level management, Project Manager, or other equivalent authority for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside of Alpha-Omega Services, Inc. are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees only in accordance with appropriate regulatory provisions or proprietary agreements.
 7. The documentation mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which customarily held in confidence by Alpha-Omega Services, Inc.
 8. The information mentioned in paragraph 2 provides information in support of the licensing of the AOS Transport Packaging System.
 9. The information to the best of my knowledge and belief has consistently been held in confidence by Alpha-Omega Services, Inc., no public disclosure has been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
 10. Public disclosure of information sought to be withheld is likely to cause substantial harm to the competitive position of Alpha-Omega Services, Inc. and deprive or reduce the availability of profit-making opportunities because:
 - a. It was developed with the expenditure of resources exceeding \$4,000,000.
 - b. Public availability of this information would deprive Alpha-Omega Services, Inc. of the ability to seek reimbursement and would permit competitors to utilize this information to Alpha-Omega Services, Inc.’s detriment.
 - c. Public availability of the information would allow competitors to obtain information at no cost which Alpha-Omega Services, Inc. developed at substantial cost. Use of this information by competitors would give them a competitive advantage over Alpha-Omega Services, Inc. by allowing competitors to design Type B packages at lower cost than Alpha-Omega Services, Inc.

The above initial evidential justification requesting that the information contained in the proprietary document be withheld from public disclosure is further supplemented by the additional following information.

Alpha-Omega Services, Inc. feels that the information sought to be withheld is truly proprietary in nature. Public disclosure of this information, sought to be withheld, would permit Alpha-Omega Services, Inc.’s competitors in need of similar Type B packaging to construct such packaging without incurring significant development cost. This would place Alpha-Omega Services, Inc. at a competitive disadvantage in making these Type B containers available to the industry.

State of California)ss:
County of Los Angeles)

Troy Hedger, being duly sworn, deposes and says:

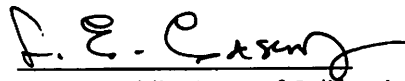
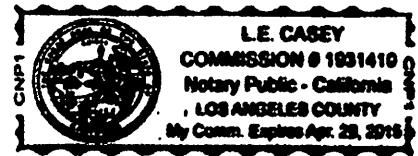
That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at Bellflower, California, this 8th day of June 2011



Troy Hedger
Alpha-Omega Services, Inc.

Subscribed and sworn before me this 8th day of June 2011



Notary Public, State of California

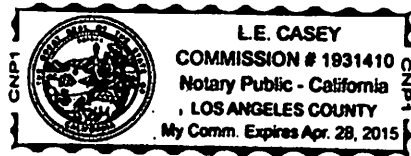
Jurat

State of California)

County of Los Angeles)

Subscribed and sworn to (or affirmed) before me on this 8th day of June, 2011,
by Troy Hedger
provided to me on the basis of satisfactory evidence to be the person(s) who appeared before
me.

L. E. Casey (Seal)
Signature of Notary



Description of Document

Title: Supplementary Affidavit

Containing 3 Pages 1 Sides, and Dated: June 8, 2011