



November 18, 2013

Headquarters  
U.S. Nuclear Regulatory Commission  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
Washington, DC 20555-0001

Attention: Dr. John Vera, Project Manager, Licensing Branch

SUBJECT: SUPPLEMENTAL SUBMISSION (11-15-2013)  
REQUEST TO AMEND CERTIFICATE OF COMPLIANCE USA/9316/B(U)-96  
Dated 09-26-2013

Reference: Docket No. 71-9316

Dr. Vera:

On September 26, 2013, Alpha-Omega Services, Inc. (AOS) requested an amendment to Certificate of Compliance USA/9316/B(U)-96. We would like to supplement this request to include a change to the depth of the O-Ring groove in the AOS-100 Cask Lid.

During the preliminary Leakage Rate Testing on the newly fabricated model AOS-100 casks, we discovered an error in the Certification Drawings for the casks. The depth of the O-Ring gland for the model AOS-100 was greater than that recommended by the seal manufacturer. This resulted in less than the recommended seal compression.

As a supplemental submission to AOS's request, the table below summarizes the existing and revised dimensions for the O-Ring gland depth. The new gland depth is the depth recommended by both Parker (for the elastomeric seal) and by The Technetics Group (for the metallic seal).

<b>Summary of AOS-100 Seal Thicknesses and Gland Depth</b>	
Drawing numbers	105E9712 & 105E9719
Elastomeric Seal Thickness	0.140 in.
Metallic Seal Thickness	0.138 in.
Current Gland depth	0.123 in.
Revised Gland depth	0.107 in.

The changes that we would like to incorporate are a result of lessons learned during manufacturing, are minor in nature, and are summarized in the attachments.

Enclosed are the revised Certification Drawings 105E9712 Revision J, and 105E9719 Revision J.

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Please note that these designs are being fabricated for the first time and no shipments have been made.

We hope that the preceding is in accordance with your understanding. If you have any questions, please feel free to contact us.

Best Regards,



Troy Hedger, President  
Alpha-Omega Services, Inc.

Attachments:

1.3.1: Certification Drawings

Table of Changes – AOS Transport Packaging; AOS-100

AOS Affidavit for withholding from public records (re: Certification drawings)

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**Attachment: Section 1.3.1 (11-15-2013)**

**1.3.1 AOS Transport Packaging System, Certification Drawings**

Table 1-5 lists the certification drawings for the AOS Transport Packaging System's assembly, impact limiter, cask, and linear/axial shielding plates, by model.

Table 1-5 AOS Transport Packaging System Certification Drawing List – All Models

Model	Assembly	Rev.	Impact Limiter	Rev.	Cask <sup>a</sup>	Rev.	Liner/Axial Shielding Plates	Rev.
AOS-025A	166D8142	I	105E9722	H	166D8143	H	183C8485	G
AOS-050A	105E9718	I	166D8138	H	166D8137	H	--	--
AOS-100A	105E9711	I	105E9713	H	105E9712G001	J	183C8491	H
AOS-100B	105E9711	I	105E9713	H	105E9712G002	J	183C8491	H
AOS-100A-S	105E9711	I	105E9713	H	105E9719	J	183C8491	H

*a. The G00x number appended to select drawing numbers represents a group within the drawing*

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<b>TABLE OF CHANGES – AOS Transport Packaging, AOS-100</b>				
<b>DRAWING NO.</b>	<b>ITEM</b>	<b>CHANGES</b>		<b>JUSTIFICATION</b>
		<b>BEFORE</b>	<b>NOW</b>	
105E9712 Rev. J	SHEET 2 DETAIL C-C	.123	.107	Correction of Gland Depth for the Lid Seals to be in compliance with the manufacturer's recommended practices Tolerance adjustment for manufacturability and tighter tolerancing is to be identified on the fabrication drawings, as required
	SHEET 3 DETAIL D-D	.123	.107	Correction of Gland Depth for the Lid Seals to be in compliance with the manufacturer's recommended practices Tolerance adjustment for manufacturability and tighter tolerancing is to be identified on the fabrication drawings, as required
105E9719 Rev. J	SHEET 2 DETAIL R	.123	.107	Correction of Gland Depth for the Lid Seals to be in compliance with the manufacturer's recommended practices Tolerance adjustment for manufacturability and tighter tolerancing is to be identified on the fabrication drawings, as required

**The following 5 Proprietary Drawings  
specifically reference**

**SUPPLEMENTAL SUBMISSION  
(11-15-2013)**

**REQUEST TO AMEND CERTIFICATE  
OF COMPLIANCE**

**USA/9316/B(U)-96**

**DOCKET NO. 71-9316**

**D01 to D05X**



Alpha-Omega Services, Inc.  
Supplementary Affidavit

September 26, 2013

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:
  - a. Alpha-Omega Services, Inc.'s drawing numbers: 105E9722, 166D8143, 166D8137, 166D8138, 105E9712, 105E9713 and 105E9719;
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."

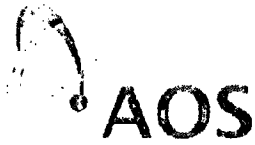
4. Some examples of categories of information which fit into the definition of proprietary information are:
  - a. Information that discloses an apparatus where prevention of its use by Alpha-Omega Services' competitors without license from Alpha-Omega Services constitutes a competitive economic advantage 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;



Alpha-Omega Services, Inc.

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.

Drawings 105E9722, 166D8143, 166D8137, 166D8138, 105E9712, 105E9713, and 105E9719 contain sufficiently detailed information to permit a competitor to copy the AOS Transport Packaging System design. For example, drawing 105E9722, 166D8143, 166D8137, 166D8138, 105E9712, 105E9713 and 105E9719 contain construction details for the package cask and impact limiters.

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.

Bellflower, California, this 26<sup>th</sup> day of September 2013

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

Troy Hedger  
Alpha-Omega Services, Inc.

Subscribed and sworn before me this 26<sup>th</sup> day of September 2013

\_\_\_\_\_  
Notary Public, State of California

Please see Attached for  
CA Gov't Code 8202  
Compliant Jurat

**Jurat**

State of California )

County of Los Angeles )

Subscribed and sworn to (or affirmed) before me on this 26th day of September, 2013,

By Troy Hedger  
proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

L.E. Casey (Seal)  
Signature of Notary Public



**Description of Document**

Title: Affidavit

Containing <sup>4 p.c.</sup> 3 Pages 1 Sides, and Dated: September 26th, 2013