



HITACHI

GE Hitachi Nuclear Energy

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Proprietary Information Notice

Attachments 3-14 to this letter contain GE Hitachi Company ~~proprietary information which is to be withheld from public disclosure~~ in accordance with 10CFR2.390 and RIS 2005-31. Upon removal of attachments 3-14 the balance of this letter may be made public.

SPM 14-042

December 12, 2014

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

Attn: Document Control Desk

Subject: GEH Request for Letter Authorization to Use the Model No. 2000 Package, Docket No. 71-9228

References: 1) Model No. 2000 Shipping Cask-Certification Number 9228 Rev. 26, Docket Number 71-9228, Package Identification USA/9228/B(U)F-96
2) GE Radioactive Material Transport Package 2000 Watts Decay Heat Upgrade Safety Analysis Report, NEDO-32318, August 2000.
3) GE Model 2000 Shipping Package Safety Analysis Report, NEDO-31518, April 1988.
4) NRC/GEH Meeting, 8/21/14

Dear Sir or Madam:

As discussed with NRC Spent Fuel Management staff on August 21, 2014 (Reference 4), GE-Hitachi Nuclear Energy (GEH) hereby submits a request for a letter authorization to use the Model No. 2000 package with a new internal package configuration. GEH has contracted with utility customers to produce Co-60 at two currently operating nuclear power plants. This letter authorization is needed because the timeframe for the transport of this Co-60 is not supported by the time required to revise the Model No. 2000 SAR and current CoC to add the new package insert design as an authorized configuration in the Model No. 2000 package. The first Co-60 shipment is scheduled in June 2015 and additional shipments are expected through May 2016. For this reason, GEH requests NRC review and approval of the attached letter authorization request by May 12, 2015.

SUMMARY

GEH is requesting a letter authorization to use Certificate of Compliance (CoC) No. 9228, Rev. 26 and the Model No. 2000 transportation package with a new package insert configuration. GEH has provided sufficient assessment and supplemental evaluations that the new insert configuration design does not affect the ability of the package to meet the requirements of 10 CFR 71 and can be approved.

EVALUATION

A new Model No. 2000 insert configuration and material basket is described in Attachment 2 to this letter. This insert configuration is not currently described as an approved Model No. 2000 CoC package configuration. Also in Attachment 2 to this letter, GEH has provided the technical basis for NRC staff review based on the current Model No. 2000 Radioactive Material Transport Package Safety Analysis

Reports (References 2 & 3). The Attachment 2 information has been formatted consistent with NRC Regulatory Guide 7.9 "Standard Format and Content of Part 71 Packages for Radioactive Material" to aid NRC staff review and approval.

GEH has performed specific structural, thermal, containment, and shielding evaluations to supplement the Model No. 2000 package Safety Analysis Report for these shipments. The structural evaluation demonstrates that the new insert configuration within the Model No. 2000 package meets all of the structural requirements of 10 CFR 71.71 and 10 CFR 71.73 and is bounded by the package testing performed for the current authorized contents. Additional evaluations demonstrate that the new insert design has sufficient margin under normal and accident conditions to safely transport the requested Co-60 shipments. These evaluations are provided in Attachment 2, Section 2 (Structural Evaluation), Section 3 (Thermal Evaluation, Section 4 (Containment Analysis), and Section 5 (Shielding Evaluation).

CONDITIONS

For the requested Co-60 shipments, the following conditions will apply and have been incorporated into the GEH specific evaluations:

1. Shipments will be made in the current Model No. 2000 packaging using a new configuration insert, dedicated material basket and as exclusive use.
2. The maximum activity for the package design is 194,400 Curies, limited by the thermal evaluation to 3000 Watts.
3. The shipments are planned to occur between June 2015 and May 2016.
4. All other conditions of CoC 9228 shall remain the same.
5. This authorization shall expire after the final shipment from the two plants or no later than August 2016.

CONCLUSION

Based on the statements and representations contained in the letter authorization request and the conditions listed above, GEH concludes that the new configuration design does not affect the ability of the package to meet the requirements of 10 CFR Part 71 and the requested contents can be safely transported.

Please contact Bryce MacDonald at 910-819-6537 or myself if there are questions regarding this request.

Sincerely,


Scott P. Murray, Manager
Facility Licensing

Commitments: None

Attachments: 1. Affidavit
2. Special Authorization Request (Redacted – Public Version)
3. Drawing Number 001N8422r0
4. Drawing Number 001N8423r0
5. Drawing Number 001N8424r0
6. Drawing Number 001N8425r0
7. Drawing Number 001N8427r0
8. Drawing Number 001N8428r0
9. Drawing Number 101E8718r14
10. Drawing Number 105E9520r6
11. LS-DYNA Input/Output Files
12. ANSYS Input/Output Files
13. MCNP Input/Output Files
14. Parts Lists with Safety Classification

Cc: J. Vera, NRC SFM, Washington, D.C.

Attachment 1

GE-Hitachi Nuclear Energy

AFFIDAVIT

I, **Scott P. Murray**, state as follows:

- (1) I am the Manager, Facility Licensing of GE-Hitachi Nuclear Energy (GEH) and have been delegated the function by GEH 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 is contained in Attachments 3-14 to GEH's letter, SPM 14-042, Scott P. Murray to Director, Division of Spent Fuel Management entitled GEH Request for Special Authorization to Use the Model No. 2000 Package, Docket No. 71-9228. GEH proprietary information is contained in Attachments 3-14, and is identified by the statement "GE Hitachi Proprietary Information".
- (3) In making this application for withholding of proprietary information of which it is the owner or licensee, GEH relies upon the exemption from disclosure set forth in the Freedom of Information Act (FOIA), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), and 2.390(a)(4) for trade secrets (Exemption 4). The material for which exemption from disclosure is here sought also qualifies under the narrower definition of trade secret, within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975 F2d 871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704 F2d 1280 (DC Cir. 1983).
- (4) The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (4)a. and (4)b. Some examples of categories of information that fit into the definition of proprietary information are:
 - a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by GEH's competitors without license from GEH constitutes a competitive economic advantage over GEH and/or other companies.
 - b. Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
- (5) To address 10 CFR 2.390(b)(4), the information sought to be withheld is being submitted to the NRC in confidence. The information is of a sort customarily held in confidence by GEH, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GEH, not been disclosed publicly, and not been made available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary and/or confidentiality agreements that provide for maintaining the information in confidence. The initial designation of this information as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure are as set forth in the following paragraphs (6) and (7).
- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, who is the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge, or who is the person most likely to be subject to the terms under which it was licensed to GEH.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist, or other equivalent authority for technical content, competitive

