

February 4, 2015

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Information Related to the NAC MAGNASTOR® Cask System Biennial Update

Docket No. 72-1031

- References:
1. ED20130020, Submission of Final Safety Analysis Report (FSAR), Revision 4, for the NAC MAGNASTOR® Cask System, February 20, 2013
 2. ED20130137, Submission of Final Safety Analysis Report (FSAR), Revision 5, for the NAC MAGNASTOR® Cask System, September 25, 2013
 3. ED20140125, Submission of Final Safety Analysis Report (FSAR), Revision 6, for the NAC MAGNASTOR® Cask System, December 10, 2014

As part of the biennial update period between February 5, 2013 and February 4, 2015, References 1, 2 and 3 were submitted with a detailed list of changes, 72.48 determination summary report and an FSAR certification of accuracy. In addition to those submittals, NAC is submitting an additional 72.48 determination summary report, see Attachment 2, for changes that have been made that were not part of those submittals (References 1, 2, and 3). These changes will be reflected in the next revision of the MAGNASTOR FSAR, which will be Revision 7. Revision 7 is in development and is planned on being issued immediately after MAGNASTOR Amendment 5 becomes effective so it will include those changes that are part of Amendments 4 and 5.

Attachment 2 contains NAC proprietary information and is held within a separate sealed envelope marked as "NAC Proprietary Information." An Affidavit pursuant to 10 CFR 2.390 is provided as Attachment 1. If you have any comments or questions regarding this submittal, please contact me on my direct line at 678-328-1236.

Sincerely,



Wren Fowler
Director, Licensing
Engineering

Attachments:

1. NAC International Affidavit Pursuant to 10 CFR 2.390
2. 10 CFR 72.48 Determination Summary Report

ADD 3
NMSS

Attachment 1

NAC International Affidavit Pursuant to 10 CFR 2.390

**NAC INTERNATIONAL
AFFIDAVIT PURSUANT TO 10 CFR 2.390**

Kent Cole (Affiant), President and CEO, of NAC International, hereinafter referred to as NAC, at 3930 East Jones Bridge Road, Norcross, Georgia 30092, being duly sworn, deposes and says that:

1. Affiant has reviewed the information described in Item 2 and is personally familiar with the trade secrets and privileged information contained therein, and is authorized to request its withholding.
2. The information to be withheld includes the following NAC Proprietary Information that is being provided in a letter containing information related to the NAC MAGNASTOR[®] cask system biennial update.
 - ED20150027, Attachment 2, Page 8 of 11

NAC is the owner of the information contained in the aforementioned pages/document, so they are considered NAC Proprietary Information.

3. NAC makes this application for withholding of proprietary information based 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 Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial financial information obtained from a person, and privileged or confidential" (Exemption 4). The information for which exemption from disclosure is herein sought is all "confidential commercial information," and some portions may also qualify under the narrower definition of "trade secret," within the meanings assigned to those terms for purposes of FOIA Exemption 4.
4. 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 competitors of NAC, without license from NAC, constitutes a competitive economic advantage over 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.
 - c. Information that reveals cost or price information, production capacities, budget levels or commercial strategies of NAC, its customers, or its suppliers.
 - d. Information that reveals aspects of past, present or future NAC customer-funded development plans and programs of potential commercial value to NAC.

**NAC INTERNATIONAL
AFFIDAVIT PURSUANT TO 10 CFR 2.390 (continued)**

- e. Information that discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information that is sought to be withheld is considered to be proprietary for the reasons set forth in Items 4.a, 4.b, and 4.d.

- 5. The information to be withheld is being transmitted to the NRC in confidence.
- 6. The information sought to be withheld, including that compiled from many sources, is of a sort customarily held in confidence by NAC, and is, in fact, so held. This information has, to the best of my knowledge and belief, consistently been held in confidence by NAC. No public disclosure has been made, and it is not 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 agreements, which provide for maintenance of the information in confidence. Its initial designation as proprietary information and the subsequent steps taken to prevent its unauthorized disclosure are as set forth in Items 7 and 8 following.
- 7. Initial approval of proprietary treatment of a document/information is made by the Vice President, Engineering, the Project Manager, the Licensing Engineer, or the Director, Licensing – the persons most likely to know the value and sensitivity of the information in relation to industry knowledge. Access to proprietary documents within NAC is limited via “controlled distribution” to individuals on a “need to know” basis. The procedure for external release of NAC proprietary documents typically requires the approval of the Project Manager based on a review of the documents for technical content, competitive effect and accuracy of the proprietary designation. Disclosures of proprietary documents outside of NAC are limited to regulatory agencies, customers and potential customers and their agents, suppliers, licensees and contractors with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- 8. NAC has invested a significant amount of time and money in the research, development, engineering and analytical costs to develop the information that is sought to be withheld as proprietary. This information is considered to be proprietary because it contains detailed descriptions of analytical approaches, methodologies, technical data and/or evaluation results not available elsewhere. The precise value of the expertise required to develop the proprietary information is difficult to quantify, but it is clearly substantial.

Public disclosure of the information to be withheld is likely to cause substantial harm to the competitive position of NAC, as the owner of the information, and reduce or eliminate the availability of profit-making opportunities. The proprietary information is part of NAC’s comprehensive spent fuel storage and transport technology base, and its commercial value extends beyond the original development cost to include the development of the expertise to determine and apply the appropriate evaluation process. The value of this proprietary information and the competitive advantage that it provides to NAC would be lost if the information were disclosed to the public. Making such information available to other parties, including competitors, without their having to make similar investments of time, labor and money would provide competitors with an unfair advantage and deprive NAC of the opportunity to seek an adequate return on its large investment.

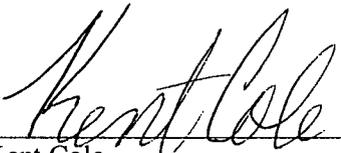
**NAC INTERNATIONAL
AFFIDAVIT PURSUANT TO 10 CFR 2.390 (continued)**

STATE OF GEORGIA, COUNTY OF GWINNETT

Mr. Kent Cole, being duly sworn, deposes and says:

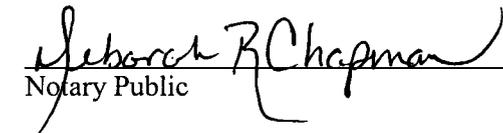
That he has read the foregoing affidavit and the matters stated herein are true and correct to the best of his knowledge, information and belief.

Executed at Norcross, Georgia, this 4th day of February, 2015.



Kent Cole
President and CEO
NAC International

Subscribed and sworn before me this 4th day of February, 2015.



Notary Public



Attachment 2

10 CFR 72.48 Determination Summary Report

72.48 Determination ID #NAC-13-MAG-033

Change Description

Revised drawing 71160-556 to add the option for standoffs at the top and bottom of the cask inner diameter for improved centering of the TSC and reduced seal stroke requirements.

Source of Change: 72.48 Determination ID #NAC-13-MAG-033

Originating Document: DCR(L) 71160-556-3A

DCR(L) 71160-556-3A added Delta note 16 to the drawing to read: "Standoffs at the top and bottom of the cask inner diameter may be used to improve centering of the TSC for reduced seal stroke requirements."

Drawing 71160-556, Assembly, MAGNASTOR Transfer Cask (MTC), Stainless Steel, Revision 3A

The drawing is to be revised as follows:

Sheet 1:

1. Add Delta note 16 to read: "Standoffs at the top and bottom of the cask inner diameter may be used to improve centering of the TSC for reduced seal stroke requirements."

72.48 Determination ID #NAC-10-MAG-057

Change Description

Revised drawing 71160-560 to add the option to use a Kevlar reinforced seal, changed note to perform VT of all welds per ASME Section V with acceptance criterion specified in Section III, Article NF-5360, and post load testing PT or MT testing to ASME code.

Source of Change: 72.48 Determination ID #NAC-10-MAG-057

Originating Document: DCR(L) 71160-560-1A

DCR(L) 71160-560-1A revised drawing 71160-560 to add the option to use a Kevlar reinforced seal, changed a note to perform VT of all welds per ASME Section V with acceptance criterion specified in Section III, Article NF-5360, and changed another note to indicate post load testing PT or MT testing to ASME code.

Drawing 71160-560, Assembly, Standard Transfer Cask, MAGNASTOR, Revision 1A

The drawing is to be revised as follows:

Sheet 1:

1. B.O.M., Item 22, revise material to "EPDM/Kevlar"; was "EPDM".
2. Revise note 3 to read "Visually inspect (VT) all welds per ASME Section V, Articles 1 and 9. Acceptance per ASME Section III, Article NF-5360."; was "Visually inspect (VT) all welds. After load testing magnetic particle inspect (MT) all critical load bearing welds,"
3. Add a note to read "After load testing inspect all accessible load bearing welds with either liquid penetrant (PT) or magnetic particle (MT). (PT) per ASME Section V, Articles 1 and 6, acceptance per Section III, Article NF-5350. (MT) per ASME Section V, Articles 1 and 7, acceptance per Section III, Article NF-5340."

72.48 Determination ID #NAC-14-MAG-103

Change Description

Revised drawing 71160-581 to correct a typo in a drawing note.

Source of Change: 72.48 Determination ID #NAC-14-MAG-103

Originating Document: DCR(L) 71160-581-4A

DCR(L) 71160-581-4A revised drawing 71160-581 to correct a drawing note which contained a typo to a section and articles of ASME code.

Drawing 71160-581, Shell Weldment, TSC, MAGNASTOR, Revision 4A

The drawing is to be revised as follows:

1. Revised Delta note 2 to read, "...Section V, Articles 1 and 4. ..." was "...Section V, Articles 1 and 5. ..."

72.48 Determination ID #NAC-13-MAG-076

Change Description

Revised drawing 71160-585 to allow up to two slots to be machined into the inner port cover.

Source of Change: 72.48 Determination ID #NAC-13-MAG-076

Originating Document: DCR(L) 71160-585-9A

DCR(L) 71160-585-9A revised drawing 71160-585 to provide licensees the option to machine one or two slots into the inner port cover to allow the introduction of helium into the port cavity. The slot size and location are such that the slot(s) can be sealed by the inner port cover weld.

Drawing 71160-585, TSC Assembly, MAGNASTOR, Revision 10

The drawing was revised as follows:

Sheet 1:

1. Add Delta note 11, "At the option of the licensee, one or two slots may be machined into the inner port cover to allow the introduction of helium into the port cavity. Slot size and location shall permit slot to be sealed by the inner port cover weld."

Sheet 2:

2. Zone A4, add Delta Note 11 symbol with leader pointing to the inner port cover.

72.48 Determination ID #NAC-14-MAG-054

Change Description

Revised drawing 71160-585 to allow port covers to be ground down in the field, added a note to call out a closure weld ring, revised the BOM, and added specification of port cover thickness.

Source of Change: 72.48 Determination ID #NAC-14-MAG-054

Originating Document: DCR(L) 71160-585-10A

DCR(L) 71160-585-10A revised drawing 71160-585 to allow port covers to be ground down in the field, added a note to call out a closure weld ring, revised the BOM, and added specification of port cover thickness.

Drawing 71160-585, TSC Assembly, MAGNASTOR, Revision 11

The drawing was revised as follows:

Sheet 1:

1. Revise delta note 3 as follows: "Items 16, 18 (Closure Ring), 8 (Port Cover) and corresponding welds shall not extend beyond the top surface of the closure lid assembly. As necessary to aid fit-up, the port covers (Item 8) may be field ground/machined to the minimum specified thickness." Was: "Weld surface not to extend beyond the top surface of the closure lid assembly".
2. Add delta note 3 to Item 18. Zone 86, add delta note 3 to closure ring weld callout.
3. Revise BOM for Item 8. Delete "1/2 plate" and Add "See Note 12" in Description.
4. Add Note 12 as shown below: "Port Covers (Item 8) shall have a minimum thickness governed by ASME SA240 specification for 3/8 plate. Thicker plate may be used with a maximum thickness of 0.52 inch."

Sheet 2:

5. Add delta note 3 to Items 8 and 16. Zone B8, add delta note 3 to closure ring weld callout.

72.48 Determination ID #NAC-14-MAG-105

Change Description

Revised drawing 71160-602 to revise the description of the Wiper Plate in the B.O.M. table.

Source of Change: 72.48 Determination ID #NAC-14-MAG-105

Originating Document: DCR(L) 71160-602-0A

DCR(L) 71160-602-0A revised drawing 71160-585 to change the Wiper Plate thickness in the B.O.M. table.

Drawing 71160-602, Damaged Fuel Can (DFC), Details, MAGNASTOR, Revision 0A

The drawing is to be revised as follows:

Sheet 1:

Revise the description of Item 4, Wiper Plate in the BOM table is ".004-.008 (.102-.203mm) SHEET/STRIP" was ".005-.008 (.127 -.203mm) SHEET/STRIP"

72.48 Determination ID #NAC-14-MAG-103

Change Description

Revised drawing 71160-681 to correct a typo in a drawing note.

Source of Change: 72.48 Determination ID #NAC-14-MAG-103

Originating Document: DCR(L) 71160-681-0A

DCR(L) 71160-681-0A revised drawing 71160-681 to correct a drawing note which contained a typo to a section and articles of ASME code.

Drawing 71160-681, DF, Shell Weldment, TSC, MAGNASTOR, Revision 0A

The drawing is to be revised as follows:

1. Revised Delta note 2 to read, "...Section V, Articles 1 and 4. ..." was "...Section V, Articles 1 and 5. ..."

72.48 Determination ID #NAC-13-MAG-077

Change Description

Revised drawing 71160-685 to allow up to two slots to be machined into the inner port cover.

Source of Change: 72.48 Determination ID #NAC-13-MAG-077

Originating Document: DCR(L) 71160-685-3A

DCR(L) 71160-685-3A revised drawing 71160-685 to provide licensees the option to machine one or two slots into the inner port cover to allow the introduction of helium into the port cavity. The slot size and location are such that the slot(s) can be sealed by the inner port cover weld.

Drawing 71160-685, DF, TSC Assembly, MAGNASTOR, Revision 4

The drawing was revised as follows:

Sheet 1:

1. Add delta note 11, "At the option of the licensee, one or two slots may be machined into the inner port cover (Items 8 & 11) to allow the introduction of helium into the port cavity. Slot size and location shall permit slot to be sealed by the inner port cover weld."

Sheet 2:

2. Zone D3, add Delta Note 11 symbol with leader pointing to the inner port cover.

72.48 Determination ID #NAC-14-MAG-054

Change Description

Revised drawing 71160-685 to allow port covers to be ground down in the field, added a note to call out a closure weld ring, revised the BOM, and added specification of port cover thickness.

Source of Change: 72.48 Determination ID #NAC-14-MAG-054

Originating Document: DCR(L) 71160-685-4A

DCR(L) 71160-685-4A revised drawing 71160-685 to allow port covers to be ground down in the field, added a note to call out a closure weld ring, revised the BOM, and added specification of port cover thickness.

Drawing 71160-685, TSC Assembly, MAGNASTOR, Revision 5

The drawing was revised as follows:

Sheet 1:

1. Revise delta note 6 as follows: "Items 9 (Closure Ring), 12 & 19 (Outer Port Cover) and corresponding welds shall not extend beyond the top surface of the closure lid assembly. As necessary to aid fit-up, the port covers (Items 8, 11, 12, 19) may be field ground/machined to the minimum specified thickness." Was: "Weld surface not to extend beyond the top surface of the closure lid assembly".
2. Revise BOM for Items 8, 11, 12 and 19. Delete "1/2 plate" and Add "See Note 12" in Description.
3. Add Note 12 as shown below: "Inner Port Cover (Items 8, 11) and Outer Port Cover (Items 12, 19) shall have a minimum thickness governed by ASME SA240 specification for 3/8 plate. Thicker plate may be used with a maximum thickness of 0.52 inch."

Sheet2

4. Add delta note 6 to Items 8, 9, 11, 12, 19.
5. Zone ES, add delta note 6 to closure ring weld callout.