



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 26, 2015

Mr. George H. Gellrich
Vice President
Exelon Generation Company, LLC
1650 Calvert Cliffs Parkway
Lusby, MD 20657

SUBJECT: AMENDMENT REQUEST NO. 1 TO RENEWED MATERIALS LICENSE NO. SNM-2505 FOR THE CALVERT CLIFFS INDEPENDENT SPENT FUEL STORAGE INSTALLATION – REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE (TAC NO. L24912)

Dear Mr. Gellrich:

By letter dated March 10, 2015, Exelon Generation submitted an affidavit dated March 9, 2015, executed by Mr. Paul Triska, AREVA, Inc., requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

1. AREVA TN Design Calculation No. NUH32PHB-0203, "Revision 2,
2. AREVA TN Design Calculation No. NUH32PHB-0203, "Revision 1,
3. AREVA TN Design Calculation No. NUH32PHB-0401, "Revision 2,
4. AREVA TN Design Calculation No. NUH32PHB-0411, "Revision 0, and
5. AREVA TN Design Calculation 10955-TLAA01 R-0, "Revision 2.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- 1) The information which is owned and has been held in confidence by AREVA Inc., sought to be withheld from public disclosure involves details regarding AREVA, Inc.'s approach to Calvert Cliffs Nuclear Power Plant intended use of the 32PHB dry spent fuel storage systems.
- 2) The information is of a type customarily held in confidence by AREVA, Inc. and not customarily disclosed to the public. AREVA, 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 AREVA, Inc. because the information consists of details regarding AREVA Inc.'s approach to Calvert Cliffs Nuclear Power Plant intended use of the 32PHB dry spent fuel storage system, 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 AREVA Inc., take marketing or other actions to improve their product's position or

impair the position of AREVA Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the U.S. Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-287-9250.

Sincerely,

/RA/

John M. Goshen, P.E., Project Manager
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No.: 72-8

TAC No.: L24912

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