



E-41436  
March 23, 2015

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Subject: Calculation to Support NUHOMS® EOS System Revised Response to RSI #2 Structural  
– NP (Docket 72-1042, TAC No. L24976)

- Reference:
- 1) Telephone Discussion between NRC Staff and AREVA TN Americas to Discuss NRC Comments on EOS RSI #2 Structural Response, held on March 5, 2015.
  - 2) Telephone Discussion between NRC Staff and AREVA TN Americas to Discuss Path Forward to Revise the EOS RSI #2 Structural Response, held on March 12, 2015.
  - 3) Revision 1 to AREVA Inc. Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System (Docket 72-1042, TAC No. L24976) (submittal TN E-41033, transmitted to the NRC on February 16, 2015).

Pursuant to the March 5th telephone discussion between NRC staff and AREVA TN Americas (Reference 1) wherein the NRC described their comments regarding the response provided in AREVA TN Americas RSI #2-Structural response (Reference 3), AREVA TN Americas investigated the issue further and provided a proposed path forward to resolve NRC staff's comments. This was discussed during a follow-up telephone meeting on March 12th (Reference 2). As discussed during this call, AREVA TN Americas is providing and submitting the calculation to address NRC staff's comments on the response to RSI #2-Structural. The purpose of this calculation is to structurally qualify the EOS-37PTH and EOS-89BTH DSCs for storage in EOS- HSM modules, and for transfer in EOS-TC108/EOS-TC125/EOS-TC135 transfer casks under normal, off-normal, and accident conditions. A corresponding revision to the RSI #2-Structural response and the safety analysis report (SAR) to reflect this analysis will be provided in a subsequent submittal no later than April 3, 2015.

Enclosure 2 provides the calculation addressing NRC staff's comments expressed during the telephone discussions on March 5th and March 12th. Enclosure 3 provides a listing of the computer files contained in Enclosure 4. The computer files are provided in Enclosure 4. Because the calculation in Enclosure 2 and the data provided in Enclosure 4 are proprietary in their entirety, no public versions are provided.

This submittal contains proprietary information, which may not be used for any purpose other than NRC staff review of the application. In accordance with 10 CFR 2.390, an affidavit (Enclosure 1) requesting the withholding of proprietary information from public disclosure is enclosed.

## AREVA TN

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NM5526

Should you have any questions regarding this submittal, please contact Mr. Dennis Williford by telephone at (704) 805-2223, or by email at [Dennnis.Williford@areva.com](mailto:Dennnis.Williford@areva.com).

Sincerely,



Paul Triska  
Vice President, Technical Services

cc: John-Chau Nguyen (NRC SFM) as follows, all provided in a separate mailing:

- 10 computer disks with the cover letter and Enclosures 1 through 3 (i.e., Document Components 001 through 005)
- One hard drive with Enclosure 4 (i.e., Document Component 006)

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Calculation Supporting Revised Response to RSI #2- Structural-NP (Proprietary)
3. Listing of Computer Files Contained in Enclosure 4
4. Computer files associated with the analyses of the NUHOMS<sup>®</sup> EOS System (Proprietary)

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**AREVA TN**

**Document Components for E-41436:**

001 Public AREVA Inc. Transmittal Letter.pdf, 170,107 bytes  
002 Public Encl 1 Affidavit.pdf, 67,209 bytes  
003 SUNSI Encl 2 Calc For RSI 2-Struc-1 of 2.pdf, 27,255,240 bytes, Proprietary  
004 SUNSI Encl 2 Calc For RSI 2-Struc-2 of 2.pdf, 31,121,458 bytes, Proprietary  
005 Public Encl 3 List of Encl 4 files.pdf, 88,467 bytes  
006 SUNSI Encl 4 Computer Files (folder), 107,504,116,029 bytes, Proprietary

**OSM#1 (Entire Submittal) (Portable Hard Drive):**

001 Public AREVA Inc. Transmittal Letter.pdf, 170,107 bytes  
002 Public Encl 1 Affidavit.pdf, 67,209 bytes  
003 SUNSI Encl 2 Calc For RSI 2-Struc-1 of 2.pdf, 27,255,240 bytes, Proprietary  
004 SUNSI Encl 2 Calc For RSI 2-Struc-2 of 2.pdf, 31,121,458 bytes, Proprietary  
005 Public Encl 3 List of Encl 4 files.pdf, 88,467 bytes  
006 SUNSI Encl 4 Computer Files (folder), 107,504,116,029 bytes, Proprietary

**OSM#2 (Public Information Only) (DVD):**

001 Public AREVA Inc. Transmittal Letter.pdf, 170,107 bytes  
002 Public Encl 1 Affidavit.pdf, 67,209 bytes  
005 Public Encl 3 List of Encl 4 files.pdf, 88,467 bytes

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**AREVA TN**

**AFFIDAVIT PURSUANT  
TO 10 CFR 2.390**

AREVA Inc. )  
State of Maryland ) SS.  
County of Howard )

I, Paul Triska, depose and say that I am a Vice President of AREVA Inc., duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission’s regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosures 2 and 4 and is listed below:

- Enclosure 2 Calculation Supporting Revised Response to RSI #2- Structural-NP
- Enclosure 4 Computer Files associated with the analyses of the NUHOMS® EOS System

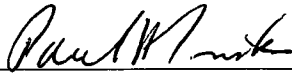
These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by AREVA Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

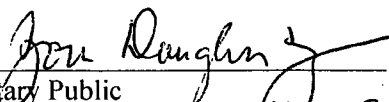
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission’s regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves certain analyses and computer files related to the design of the NUHOMS® EOS System, which are owned and have been held in confidence by AREVA Inc.
- 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 descriptions of the analysis of a spent fuel dry storage system, the application of which provide 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.

Further the deponent sayeth not.

  
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Paul Triska  
Vice President, AREVA Inc.

Subscribed and sworn to me before this 23rd day of March, 2015.

  
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Notary Public  
My Commission Expires 10 / 17 / 2015

