



E-41532  
April 3, 2015

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

Subject: Revised Response to RSI #2 Structural-NP Request and Revision 2 to AREVA Inc. Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System (Docket 72-1042, TAC No. L24976).

- Reference:
- 1) Telephone Discussion between NRC Staff and AREVA Inc. to Discuss Path Forward to Revise the Response to EOS RSI #2 Structural-NP, held on 3/12/2015.
  - 2) 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 E-41033, transmitted to the NRC on 2/16/2015).
  - 3) Calculation to Support NUHOMS® EOS System Revised Response to RSI #2 Structural-NP (Docket 72-1042, TAC No. L24976) (submittal E-41436, transmitted to the NRC on 3/23/2015).

Pursuant to the March 12, 2015 telephone discussion between U.S. Nuclear Regulatory Commission (NRC) staff and AREVA Inc. (Reference 1), wherein AREVA Inc. provided a proposed path forward to resolve NRC staff's comment on the original response (provided in Reference 2) to RSI #2 Structural-NP, a revised response to RSI #2 Structural-NP is provided herein. In addition, a complete revision to the safety analysis report (SAR) is provided to reflect the analysis submitted in Reference 3. The enclosed Revision 2 to the SAR includes a description of the associated changes in the structural model, and results.

Enclosure 2 provides AREVA Inc.'s revised response to the RSI #2 Structural-NP request. A public version of the revised RSI response is provided as Enclosure 3. Enclosure 4 provides a list of changed SAR pages, with a reason for each changed page. Enclosures 5 and 6 provide Revision 2 to the proposed Certificate of Compliance (CoC) and Technical Specifications, respectively (no changes from that provided in the Revision 1 transmittal of February 16, 2015). Enclosure 7 provides the proprietary version of Revision 2 to the SAR, and the public version is provided in Enclosure 8. Changes to the Revision 2 SAR pages are tracked with italicized text and revision bars in the right margin.

## AREVA TN

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AREVA Inc.  
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[us.aveva.com/AREVATN](http://us.aveva.com/AREVATN)

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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.

Should you have any questions regarding this submittal, please contact Mr. Dennis Williford by telephone at (704) 805-2223, or by email at [Dennis.Williford@areva.com](mailto:Dennis.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, 2 and 4 through 7

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Revision 1 to AREVA Inc. Response to RSI #2- Structural-NP (Proprietary Version)
3. Revision 1 to AREVA Inc. Response to RSI #2- Structural-NP (Public Version)
4. List of Changed SAR Pages with Reason for Change
5. Revision 2 to Proposed Certificate of Compliance
6. Revision 2 to Proposed Technical Specifications
7. NUHOMS<sup>®</sup> EOS System Safety Analysis Report, Revision 2 (Proprietary Version)
8. NUHOMS<sup>®</sup> EOS System Safety Analysis Report, Revision 2 (Public Version)

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**Document Components for E-41532:**

- 001 Public AREVA Inc. Transmittal Letter.pdf, 623,960 bytes
- 002 Public Enc 1 Affidavit.pdf, 139,264 bytes
- 003 SUNSI Enc 2 Revised RSI 2-Struc Response.pdf, 81,920 bytes, Proprietary
- 004 Public Enc 3 Revised RSI 2-Struc Response.pdf, 65,536 bytes
- 005 Public Enc 4 List of Changed SAR Pages.pdf, 73,728 bytes
- 006 Public Enc 5 Proposed CoC - R2.pdf, 204,800 bytes
- 007 Public Enc 6 Proposed TS - R2.pdf, 602,112 bytes
  
- 008 SUNSI Enc 7 SAR 1-of-10 R2 Cover to Ch 3.pdf, 22,802,432 bytes, Proprietary
- 009 SUNSI Enc 7 SAR 2-of-10 R2 App 3.9.1,2.pdf, 35,434,496 bytes, Proprietary
- 010 SUNSI Enc 7 SAR 3-of-10 R2 App 3.9.3,4.pdf, 16,527,360 bytes, Proprietary
- 011 SUNSI Enc 7 SAR 4-of-10 R2 App 3.9.5,6,7.pdf, 38,109,184 bytes, Proprietary
- 012 SUNSI Enc 7 SAR 5-of-10 R2 Ch 4 - 1 of 4.pdf, 24,236,032 bytes, Proprietary
- 013 SUNSI Enc 7 SAR 6-of-10 R2 Ch 4 - 2 of 4.pdf, 35,123,200 bytes, Proprietary
- 014 SUNSI Enc 7 SAR 7-of-10 R2 Ch 4 - 3 of 4.pdf, 15,126,528 bytes, Proprietary
- 015 SUNSI Enc 7 SAR 8-of-10 R2 Ch 4 - 4 of 4.pdf, 28,631,040 bytes, Proprietary
- 016 SUNSI Enc 7 SAR 9-of-10 R2 App 4.9.1,2,3.pdf, 17,338,368 bytes, Proprietary
- 017 SUNSI Enc 7 SAR 10-of-10 R2 Ch 5 to 14.pdf, 30,834,688 bytes, Proprietary
  
- 018 Public Enc 8 SAR 1-of-10 R2 Cover to Ch 3.pdf, 15,495,168 bytes
- 019 Public Enc 8 SAR 2-of-10 R2 App 3.9.1,2.pdf, 28,958,720 bytes
- 020 Public Enc 8 SAR 3-of-10 R2 App 3.9.3,4.pdf, 4,816,896 bytes
- 021 Public Enc 8 SAR 4-of-10 R2 App 3.9.5,6,7.pdf, 24,870,912 bytes
- 022 Public Enc 8 SAR 5-of-10 R2 Ch 4 - 1 of 4.pdf, 15,601,664 bytes
- 023 Public Enc 8 SAR 6-of-10 R2 Ch 4 - 2 of 4.pdf, 18,374,656 bytes
- 024 Public Enc 8 SAR 7-of-10 R2 Ch 4 - 3 of 4.pdf, 16,207,872 bytes
- 025 Public Enc 8 SAR 8-of-10 R2 Ch 4 - 4 of 4.pdf, 18,370,560 bytes
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**OSM#1 (Entire Submittal) (DVD):**

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