



May 15, 2015
E-41966

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

Subject: Additional Response to Request for Information - AREVA Inc. Renewal Application for the Standardized NUHOMS[®] System - CoC 1004 (Docket 72-1004, TAC No. L24760)

References: 1. Letter from Paul Triska (AREVA Inc.) to Document Control Desk (NRC), "Renewal Application for the Standardized NUHOMS[®] System – CoC 1004," November 4, 2014, E-39887 (Docket No. 72-1004).

2. Email from Jennifer Davis (NRC) to Don Shaw (AREVA Inc.), "Request for Information for CoC 1004 Renewal," February 26, 2015.

3. Letter from Paul Triska (AREVA Inc.) to Document Control Desk (NRC), "Response to Request for Information - AREVA Inc. Renewal Application for the Standardized NUHOMS[®] System - CoC 1004," March 16, 2015, E-41361 (Docket No. 72-1004, TAC No. L24760).

In Reference 1, AREVA Inc. submitted an application for renewal of the spent fuel storage cask Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel. A request for information was received in Reference 2 prior to the scheduled Request for Additional Information (RAI). Reference 3 provided the requested information except for one reference; an Electric Power Research Institute (EPRI) document.

The purpose of this submittal is to provide the requested EPRI document – Reference 3H.5.16 as cited in the Reference 1 renewal application. The EPRI document provided in Enclosure 2 is owned by EPRI and is being held-in confidence by AREVA Inc.

This submittal contains proprietary information, which may not be used for any purpose other than NRC staff review of the renewal application for the Standardized NUHOMS[®] System. Further distribution of this reference is restricted. 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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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.

Sincerely,



Paul Triska
Vice President, Technical Services

cc: B. Jennifer Davis (NRC SFM) as follows, provided in a separate mailing:

- 10 computer disks with the cover letter and Enclosures 1 and 2

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Reference 3H.5.16 from Enclosure 2 to E-39887 (Proprietary)

AREVA TN

Document Components:

001 Public AREVA Inc. Transmittal Letter.pdf 188,918 bytes
002 Public Encl 1 Affidavit.pdf 213,777 bytes
003 SUNSI Encl 2 Applic Ref 3H.5.16-Part 1.pdf 13,868,258 bytes, Proprietary
004 SUNSI Encl 2 Applic Ref 3H.5.16-Part 2.pdf 47,622,720 bytes, Proprietary

OSM#1 (Entire Submittal) (DVD):

001 Public AREVA Inc. Transmittal Letter.pdf 188,918 bytes
002 Public Encl 1 Affidavit.pdf 213,777 bytes
003 SUNSI Encl 2 Applic Ref 3H.5.16-Part 1.pdf 13,868,258 bytes, Proprietary
004 SUNSI Encl 2 Applic Ref 3H.5.16-Part 2.pdf 47,622,720 bytes, Proprietary

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

001 Public AREVA Inc. Transmittal Letter.pdf 188,918 bytes
002 Public Encl 1 Affidavit.pdf 213,777 bytes

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 that 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 Enclosure 2 listed below:

- Reference 3H.5.16 as listed in Enclosure 2 of AREVA submittal E-39887, dated November 4, 2014, which is an Electric Power Research Institute (EPRI) report whose title and number are considered proprietary.

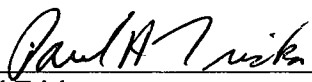
This document has been appropriately designated as proprietary. This reference is being used to support the renewal application for the Standardized NUHOMS® System and is being provided strictly to support the NRC staff's review for regulatory compliance purposes. Further distribution of this reference is restricted.

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.

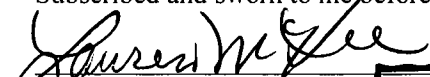
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure includes a reference associated with the renewal application for the Standardized NUHOMS® System. This reference is owned by EPRI and is being 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. and EPRI because the information consists of a reference from the Nuclear Fuel Industry Research Program of EPRI. This reference supports the renewal application for the Standardized NUHOMS® 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., to take marketing or other actions to improve their product's position, or to 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.


Paul Triska
Vice President, AREVA Inc.

Subscribed and sworn to me before this 15th day of May, 2015.


Notary Public

My Commission Expires _____ / _____

LAUREN MCKEE
Notary Public-Maryland
/ Anne Arundel County
My Commission Expires
February 12, 2019

