



Exelon Generation®

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10 CFR 72.56

September 25, 2015

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Calvert Cliffs Nuclear Power Plant
Independent Spent Fuel Storage Installation, License No. SNM-2505
NRC Docket No. 72-8

Subject: Amendment Request No. 1 to Renewed Materials License No. SNM-2505 for Calvert Cliffs Specific Independent Spent Fuel Storage Installation - Second Request for Additional Information, Part 2 and Supplemental Information

- References:
1. Letter from G. H. Gellrich (Exelon) to Document Control Desk (NRC), dated March 26, 2013, License Amendment Request: High Burnup NUHOMS®-32PHB Dry Shielded Canister and Horizontal Storage Modules
 2. Letter from J. M. Goshen (NMSS) to G. H. Gellrich (Exelon), dated June 23, 2015, Amendment Request No. 1 to Renewed Materials License No. SNM-2505 for Calvert Cliffs Specific Independent Spent Fuel Storage Installation - Second Request for Additional Information, Part 2 (TAC No. L24912)
 3. Letter from M. D. Flaherty (Exelon) to Document Control Desk (NRC), dated September 11, 2015, Amendment Request No. 1 to Renewed Materials License No. SNM-2505 for Calvert Cliffs Specific Independent Spent Fuel Storage Installation - Second Request for Additional Information, Part 2

Reference 1 submitted a license amendment request for the Calvert Cliffs Nuclear Power Plant site-specific independent spent fuel storage installation. The amendment, if approved, would authorize the storage of Westinghouse and AREVA Combustion Engineering 14x14 fuel in the NUHOMS-32PHB Dry Shielded Canister system. As part of their review, the NRC staff has requested additional information (Reference 2). Responses to the requested additional information were provided in Reference 3. Reference 3 indicated that an additional analysis would be provided separately by September 30, 2015. That analysis and its supporting analyses are attached.

NIMSSZ6

Also attached is drawing NUH32PHB-30-30, Revision 2. This drawing lists the ASME Code exceptions for the NUHOMS 32PHB Canister. This revision clarifies that the welding is done in accordance with ISG-15. This resolves any discrepancy between this drawing and other design documents.

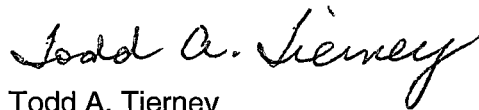
Attachments (1), (2), and (3) contain information that is proprietary to AREVA Inc., therefore, they are accompanied by an affidavit signed by AREVA, the owner of the information (Attachment 5). The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission, and addresses, with specificity, the consideration listed in 10 CFR 2.390(b)(4). Accordingly, it is requested that the information that is proprietary to AREVA, Inc. be withheld from public disclosure. Non-proprietary versions of Attachments (1), (2), and (3) are not available.

The additional information provided does not change the environmental assessment provided in Reference 1 and the categorical exclusion set forth in 10 CFR 51.22(c)(11) is still valid. There are no regulatory commitments contained in this correspondence.

Should you have questions regarding this matter, please contact Mr. Larry D. Smith at (410) 495-5219.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 25, 2015.

Respectfully,



Todd A. Tierney
Acting Plant Manager

TAT/PSF/bjm

Attachments: (1) PROPRIETARY Calculation 10955-TLAA02, Revision 0 (described as 10955-0101 Rev. 1 in Reference 3)
(2) PROPRIETARY Calculation 10955-0500, Revision 0
(3) PROPRIETARY Calculation 10955-0501, Revision 0
(4) Drawing NUH32PHB-30-30, Rev. 2
(5) AREVA Affidavit

cc: J. M. Goshen, NMSS

(Without Attachments)

NRC Project Manager, Calvert Cliffs
NRC Regional Administrator, Region I
NRC Resident Inspector, Calvert Cliffs

S. Gray, MD-DNR
Director – NMSS

ATTACHMENT (5)

AREVA AFFIDAVIT

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

AREVA Inc.)
State of Maryland) SS.
County of Howard *cap*)
MONTGOMERY

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 listed below:

- AREVA TN Calculation 10955-0500 R-0
- AREVA TN Calculation 10955-0501 R-0
- AREVA TN Calculation 10955-TLAA02 R-0

This documentation has 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 document described above, should be withheld.

- 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 system.
- 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.

Further the deponent sayeth not.

Paul Triska
Paul Triska
Vice President, AREVA Inc.

Subscribed and sworn to before this 24th day of September, 2015.

Lewis A. Piccolino
Notary Public

My Commission Expires 03/26/2018
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