



E-42718  
September 30, 2015

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

Subject: Updated Final Safety Analysis Report for the NUHOMS® HD System, Revision 5,  
Docket No. 72-1030

Reference: Letter from Paul Triska (AREVA Inc.) to Document Control Desk (NRC) "Updated Final  
Safety Analysis Report for the NUHOMS® HD System, Revision 4, Docket No. 72-1030,"  
September 30, 2013 (E-36098)

Pursuant to 10 CFR 72.248, AREVA Inc. has updated the referenced submittal and herewith submits the subject Updated Final Safety Analysis Report (UFSAR) Revision 5 for docketing. This update to the UFSAR incorporates changes to the NUHOMS® HD System implemented by AREVA Inc. under 10 CFR 72.48 from October 1, 2013 through the date of this letter. This update also incorporates the provisions of Amendment No. 2 to Certificate of Compliance (CoC) No. 1030, which were approved by the NRC and became effective on October 14, 2014.

I certify that this submittal accurately presents changes made since the referenced submittal.

The changed areas are marked as follows.

- New or changed pages show "Rev. 5" and "09/15" in their header area.
- Changed areas are indicated using revision bars in the right-hand margin. Newly inserted text is shown in italics.
- Revision bars on "Rev. 5" pages with no annotation represent 10 CFR 72.48 changes.
- Pages that are only changed by Amendment 2 are annotated "*All changes on this page are AMD 2*" in the upper right-hand margin.
- Pages changed by both Amendment 2 and 10 CFR 72.48 are annotated as "AMD 2" adjacent to the applicable revision bars in the right-hand margin to distinguish them from 10 CFR 72.48 changes.
- One UFSAR drawing, 10494-72-120, Revision 0, is added by Amendment 2 and so annotated. All other revised drawings represent 10 CFR 72.48 changes.

This submittal includes proprietary information, which may not be used for any purpose other than NRC staff review of the UFSAR. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public

## AREVA TN

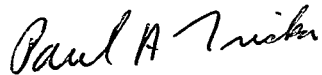
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disclosure. This submittal also includes security-related information. Accordingly, two versions of replacement pages, Proprietary and Public are provided as Enclosures 2 and 3, respectively.

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: Jennifer Davis  
(Two paper copies and five electronic copies of the NUHOMS<sup>®</sup> HD System UFSAR, Revision 5 (Proprietary Version))

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement Pages and Drawings for the NUHOMS<sup>®</sup> HD System UFSAR, Revision 5 (Proprietary Version)
3. Replacement Pages and Drawings for the NUHOMS<sup>®</sup> HD System UFSAR, Revision 5 (Public Version)

**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 and is listed below:

1. Portions of Certificate of Compliance No. 1030 Updated Final Safety Analysis Report (UFSAR) Chapter 5 and Appendix 4.16.2
2. The following UFSAR drawings:
  - 10494-72-6, Revision 3
  - 10494-72-100, Revision 6
  - 10494-72-120, Revision 0
  - 10494-72-2001-SAR, Revision 4


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.

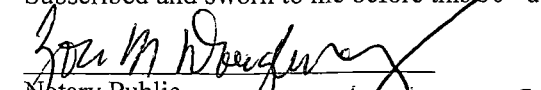
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves various safety analysis report drawings and portions of analyses associated with the design of the NUHOMS® HD Horizontal Modular Storage 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 design and analysis of a 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  
Vice President, AREVA Inc.

Subscribed and sworn to me before this 30<sup>th</sup> day of September, 2015.

  
Notary Public  
My Commission Expires 10/17, 2015

