



December 18, 2015
E-43624

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

Subject: Revision 4 to Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System, Response to Request for Additional Information (Docket No. 72-1042, TAC No. L25028)

Reference: Letter from John-Chau Nguyen (NRC) to Paul Triska (AREVA Inc.), "Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System – Request for Additional Information, Docket 72-1042, TAC No. L25028," October 16, 2015

This submittal provides responses to the request for additional information (RAI) forwarded by the letter referenced above. Enclosure 2 herein provides a proprietary version of the response to the RAI items. Enclosure 3 provides a public version of the response to the RAI items. Each RAI response has a section stating the impact of the RAI response on the application indicating which application sections, tables, etc., have been changed. Enclosure 4 provides a list of additional changes, not associated with the RAI. Enclosure 5 provides a list of the changes to the Certificate of Compliance (CoC), Technical Specifications (TS), and safety analysis report (SAR) with a reason for each change. Enclosures 6 and 7 provide a complete update to the proposed CoC and TS, respectively. Enclosure 8 provides the proprietary version of a complete revision to the SAR application, denoted as Revision 4. The public version of Revision 4 to the application is provided as Enclosure 9. Revision 4 changes are tracked with italicized text and revision bars in the right margin to provide NRC staff reviewers with a convenient way to identify the changes made since Revision 3. Enclosure 10 provides a listing of computer files contained in Enclosure 11. Enclosure 11 provides computer files that are associated with some of the RAI responses.

Based on a discussion with the NRC Project Manager on December 10, 2015, RAI Question 4-28 has been officially withdrawn from the list of RAIs provided in the referenced letter. Therefore, no response is required. This question has been deleted from the list of RAI questions and responses in Enclosures 2 and 3.

Enclosures 2, 8 and 11 of this submittal include 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) is provided specifically requesting that you withhold this proprietary information from public disclosure.

AREVA TN

AREVA Inc.
7135 Minstrel Way - Suite 300 - Columbia, MD 21045 USA
Tel.: (410) 910-6900 - Fax: (410) 910-6902
us.aveva.com/AREVATN

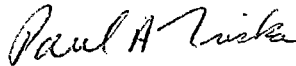
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Enclosures transmitted herein contain SUNSI. When separated from enclosures, this transmittal document is decontrolled.

Should NRC staff have any questions or require additional information to support the review of this application, please contact Mr. Dennis Williford by telephone at (704) 805-2223, or by email at Dennis.Williford@areva.com.

Sincerely,



Paul Triska
Vice President, Business Operations

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

- Three computer disks with the cover letter and Enclosures 1 through 10
- One hard drive with the cover letter and Enclosures 1 through 11 (OSM#1)

Enclosures:

1. Affidavit pursuant to 10 CFR 2.390
2. Responses to Request for Additional Information (Proprietary Version)
3. Responses to Request for Additional Information (Public Version)
4. List of Additional Changes Not Associated with the RAI
5. List of Changes to CoC, TS, and SAR
6. Revision 4 to Proposed Certificate of Compliance
7. Revision 4 to Proposed Technical Specifications
8. NUHOMS® EOS System Safety Analysis Report, Revision 4 (Proprietary Version)
9. NUHOMS® EOS System Safety Analysis Report, Revision 4 (Public Version)
10. Listing of Computer Files Contained in Enclosure 11
11. Computer Files associated with the analyses of the NUHOMS® EOS System (Proprietary)

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Tel.: (410) 910-6900 - Fax: (410) 910-6902
us.aveva.com/AREVATN

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Document Components:

- 001 Public AREVA Inc. Transmittal Letter.pdf, 607,784 bytes
- 002 Public Enc 1 Affidavit.pdf, 2,220,649 bytes
- 003 SUNSI Enc 2 Responses to RAI.pdf, 7,163,571 bytes, Proprietary
- 004 Public Enc 3 Responses to RAI.pdf, 4,945,604 bytes
- 005 Public Enc 4 List of nonRAI Changes.pdf, 102,711 bytes
- 006 Public Enc 5 List of Changes to App.pdf, 107,096 bytes
- 007 Public Enc 6 Proposed CoC – R4.pdf, 197,355 bytes
- 008 Public Enc 7 Proposed TS – R4.pdf, 692,291 bytes

- 009 SUNSI Enc 8 SAR 1-of-10 R4 Cover to Ch 3.pdf, 29,415,450 bytes, Proprietary
- 010 SUNSI Enc 8 SAR 2-of-10 R4 Ap 3.9.1,2.pdf, 45,382,288 bytes, Proprietary
- 011 SUNSI Enc 8 SAR 3-of-10 R4 Ap 3.9.3,4.pdf, 16,752,187 bytes, Proprietary
- 012 SUNSI Enc 8 SAR 4-of-10 R4 Ap 3.9.5,6,7.pdf, 35,972,948 bytes, Proprietary
- 013 SUNSI Enc 8 SAR 5-of-10 R4 Ch 4 - 1 of 4.pdf, 23,461,871 bytes, Proprietary
- 014 SUNSI Enc 8 SAR 6-of-10 R4 Ch 4 - 2 of 4.pdf, 29,027,044 bytes, Proprietary
- 015 SUNSI Enc 8 SAR 7-of-10 R4 Ch 4 - 3 of 4.pdf, 13,456,222 bytes, Proprietary
- 016 SUNSI Enc 8 SAR 8-of-10 R4 Ch 4 - 4 of 4.pdf, 23,527,953 bytes, Proprietary
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- 018 SUNSI Enc 8 SAR 10-of-10 R4 Ch 5 to 14.pdf, 28,690,382 bytes, Proprietary

- 019 Public Enc 9 SAR 1-of-10 R4 Cover to Ch 3.pdf, 13,730,504 bytes
- 020 Public Enc 9 SAR 2-of-10 R4 Ap 3.9.1,2.pdf, 37,147,638 bytes
- 021 Public Enc 9 SAR 3-of-10 R4 Ap 3.9.3,4.pdf, 5,349,222 bytes
- 022 Public Enc 9 SAR 4-of-10 R4 Ap 3.9.5,6,7.pdf, 23,819,388 bytes
- 023 Public Enc 9 SAR 5-of-10 R4 Ch 4 - 1 of 4.pdf, 12,970,571 bytes
- 024 Public Enc 9 SAR 6-of-10 R4 Ch 4 - 2 of 4.pdf, 15,678,211 bytes
- 025 Public Enc 9 SAR 7-of-10 R4 Ch 4 - 3 of 4.pdf, 10,295,270 bytes
- 026 Public Enc 9 SAR 8-of-10 R4 Ch 4 - 4 of 4.pdf, 19,876,303 bytes
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- 028 Public Enc 9 SAR 10-of-10 R4 Ch 5 to 14.pdf, 23,006,731 bytes

- 029 Public Enc 10 List of Enc 11 files.pdf, 94,504 bytes
- 030 SUNSI Enc 11 Computer Files (folder) 7,711,925,036 bytes, Proprietary

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

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

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**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, 8 and 11 and is listed below:

- Enclosure 2 – Portions of certain Request for Additional Information (RAI) responses
- Enclosure 8 – Portions of certain safety analysis report (SAR) chapters and appendices
- Enclosure 8 – SAR drawings
- Enclosure 11 – Computer files associated with thermal analyses

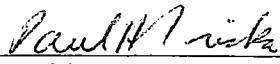
These documents have been appropriately designated as proprietary.

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 design details in the RAI responses, SAR analyses, SAR drawings, and computer files associated with 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 design and analysis of a dry spent fuel 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.



Paul Triska
Vice President, AREVA Inc.

Subscribed and sworn before me this 18th day of December, 2015.



Notary Public
My Commission Expires 10/16/19

RONDA JONES
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires October 16, 2019