



January 14, 2016  
E-44184

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

Subject: Response to Request for Information - AREVA Inc. Renewal Application for the Standardized NUHOMS® System - CoC 1004 (Docket No. 72-1004, TAC No. L24964)

- Reference: 1) Letter E-39887 from Paul Triska (AREVA Inc.) to Document Control Desk (NRC), "Renewal Application for the Standardized NUHOMS® System - CoC 1004," November 4, 2014.
- 2) E-mail from Christian Jacobs (NRC) to Donis Shaw (AREVA TN), "CoC 1004 Renewal," January 12, 2016.

Reference 1 provided 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 for an additional 40 years. In an e-mail transmitted to AREVA TN on January 12, 2016 (Reference 2), the NRC provided a draft of some potential second round requests for additional information (RAIs) and requested the computer input and output files described in Appendix 3G of Reference 1. This submittal provides the requested FLUENT computer input and output files. Enclosure 2 provides a listing of the computer files contained in Enclosure 3.

This submittal includes proprietary information, which may not be used for any purpose other than to support the NRC staff review of the application. In accordance with 10 CFR 2.390, an affidavit (Enclosure 1) is provided specifically requesting that the NRC withhold this proprietary information from public disclosure.

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

#### AREVA TN

AREVA Inc.  
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Sincerely,



Paul Triska  
Vice President, Business Operations

cc: Christian Jacobs (NRC SFM), one copy of the entire submittal (i.e., OSM#1)

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Listing of Computer Files Contained in Enclosure 3
3. Computer Files Associated with Certain AREVA Inc. Thermal Analyses (Proprietary)

**Document Components:**

001 Public AREVA Inc. Transmittal Letter.pdf, 650,632 bytes  
002 Public Enc 1 Affidavit.pdf, 663,587 bytes  
003 Public Enc 2 List of Enc 3 files.pdf, 67,205 bytes  
004 SUNSI Enc 3 Computer Files (folder) 14,554,275,840 bytes, Proprietary

**OSM#1 (Entire Submittal) (portable hard drive):**

001 Public AREVA Inc. Transmittal Letter.pdf, 650,632 bytes  
002 Public Enc 1 Affidavit.pdf, 663,587 bytes  
003 Public Enc 2 List of Enc 3 files.pdf, 67,205 bytes  
004 SUNSI Enc 3 Computer Files (folder) 14,554,275,840 bytes, Proprietary

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

001 Public AREVA Inc. Transmittal Letter.pdf, 650,632 bytes  
002 Public Enc 1 Affidavit.pdf, 663,587 bytes  
003 Public Enc 2 List of Enc 3 files.pdf, 67,205 bytes

**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.

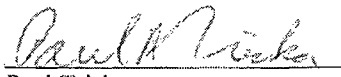
The information for which proprietary treatment is sought is contained in Enclosure 3, which contains computer input and output files associated with certain AREVA Inc. thermal analyses. Enclosure 3 has been appropriately designated as proprietary.

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 above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves certain design details contained in the computer files associated with the renewal application for the Standardized NUHOMS® 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 computer input and output files associated with the analyses for this 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 14<sup>th</sup> day of January, 2016.

  
Notary Public  
My Commission Expires 10 / 16 / 19

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