

February 2, 2016

Mr. Wren Fowler  
Director, Licensing  
NAC International  
3930 East Jones Bridge Road, Suite 200  
Norcross, GA 30092

SUBJECT: APPROVAL OF NAC INTERNATIONAL INC. REQUEST FOR WITHHOLDING  
INFORMATION FROM PUBLIC DISCLOSURE OF SUBMITTALS RELATED TO  
THE REVIEW OF REVISION 14 OF THE MODEL NO. NAC-STC

Dear Mr. Fowler:

During the review of Revision 14 of the Model No. NAC-STC transportation package, you submitted affidavits dated December 15, 2015, September 11, 2015, August 12, 2015, July 10, 2015, June 5, 2015, August 29, 2014, August 14, 2014, April 24, 2014, and November 26, 2013, requesting that information related to the Model No. NAC-STC package be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, Section 2.390. The enclosed document includes a summary of the information that the applicant requested to be withheld pursuant 10 CFR 2.390.

A non-proprietary copy of these documents, as appropriate, were placed in the U.S. Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the Agencywide Documents Access and Management System (ADAMS) Public Electronic Reading Room.

In general, the affidavits note that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Information that discloses descriptions of the design and analysis of the NAC-STC radioactive material transportation packaging, where prevention of its use by competitors of NAC International Inc., without license from NAC International Inc., constitutes a competitive economic advantage over other companies.
- Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product.
- Information that includes certain portions of the safety analysis report, computer files, and documents containing calculations related to the design of the NAC-STC radioactive material transportation packaging, which are owned and are held in confidence by Information that NAC International Inc. "has invested a significant amount of time and money in the research, development, engineering, and analytical costs to develop the information. This information contains detailed descriptions of analytical approaches, methodologies, technical data, and/or evaluation results not available elsewhere.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the version(s) of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified of the date of public disclosure, in advance which will be a reasonable time thereafter.

If you have any questions regarding this matter, you may contact me at 301-415-6999.

Sincerely,

**/RA/**

Norma García Santos, Project Manager  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 71-9235  
CAC No. L24860

Enclosure: Summary - Information  
Requested by NAC  
International Inc. to be  
Withheld Pursuant  
10 CFR 2.390

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**ADAMS Accession No.: ML16034A174**

<b>OFC</b>	DSFM		DSFM		DSFM	
<b>NAME</b>	N. Garcia Santos		DWalker		SRuffin	
<b>DATE</b>	1/21/2015		1/28/16		2/2/16	

**"C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure  
"N" = No copy**

**OFFICIAL RECORD COPY**

**Summary**  
**Information Requested by NAC International Inc.**  
**to be Withheld Pursuant 10 CFR 2.390<sup>1</sup>**

Affidavit Date	Application Revision No.	Applicant Requested to Withhold the Following Information:
December 15, 2015	15B	December 3, 2015, Partially Closed Meeting, Proprietary Slides: <ul style="list-style-type: none"> <li>- “Safely Transporting High Burn-Up Fuel (HBF)” and</li> <li>- “Assessment of HBF [High Burnup Fuel] Unresolved Material Evaluation Issues – <i>Relevant Additional Information</i>”</li> </ul>
September 11, 2015	15B	NAC International - Attachment 1, Request for Additional Information (RAI) Materials – 1-5 (RAI M-1-5) Supplement Response.
August 12, 2015	15B	<ul style="list-style-type: none"> <li>- RAI Responses Supplemented marked as "NAC PROPRIETARY INFORMATION" (i.e., RAI St-2-3 - Revised Response Figure; RAIs Th-3-5 and Th-3-6B - Supporting Max/Min Temperature Table; and RAIs Th-3-10 and Th-3-1 1 - Supporting Fire Accident Analysis);</li> <li>- NAC-STC Safety Analysis Report, Revision 15B, pages marked as "NAC PROPRIETARY INFORMATION;" and</li> <li>- Calculation Package No. 630087-2025, Revision 1.</li> </ul> <p>Note: “Th” corresponds to “Thermal” and “St” to “Structural.”</p>
July 10, 2015	15A	Calculation Package No. 630087-2025, Revision 0, “Submission of a Calculation in Support of the Responses to NRC Request for Additional Information for NAC's Request for an Amendment of Certificate of Compliance (CoC) No. 9235 for the NAC-STC Cask Calculation No. 630087-2025.” [MPC-WVDP Structural Evaluation for the STC Transport]

<sup>1</sup> This summary is based on information in the affidavits submitted by NAC International Inc. for withholding proprietary information as well as a review of portions of the applicant’s submittals.

<b>Affidavit Date</b>	<b>Application Revision No.</b>	<b>Applicant Requested to Withhold the Following Information:</b>
June 5, 2015	15A	Submission of Responses to NRC RAI for NAC's Request for an Amendment of Certificate of Compliance No. 9235 for the NAC-STC Cask <ul style="list-style-type: none"><li>- RAI Responses marked as "NAC PROPRIETARY INFORMATION;"</li><li>- NAC-STC Safety Analysis Report, Revision 15A, pages marked as "NAC PROPRIETARY INFORMATION;"</li><li>- DBTT Derivations, "HBU DBTT Data R08 (MLE and Firth).xlsx," Data Disk 1 of 1;</li><li>- Calculation Package No. 423-3000, Revision 2;</li><li>- Calculation Package No. 423-2015, Revision 0; and</li><li>- 71160-2126, Revision 3.</li></ul>
August 29, 2014	14B	Application Supplement: <ul style="list-style-type: none"><li>- NAC-STC Safety Analysis Report, Revision 14B pages marked as "NAC PROPRIETARY INFORMATION;"</li><li>- STP1529-EB-DL 5694;</li><li>- FCRD-UFD-2013-000401, ANL-13/16; and</li><li>- Calculation Package No. 423-3000, Revision 1.</li></ul>
August 14, 2014	N/A	Submission of NAC International Inc. Proprietary Slides - August 14, 2014 Partially Closed Meeting.
April 24, 2014\	14A	<ul style="list-style-type: none"><li>- NAC Responses to the NRC Request for Supplemental Information;</li><li>- NAC-STC Safety Analysis Report, Revision 14A pages marked as "NAC PROPRIETARY INFORMATION;" and</li><li>- Calculation Package No. 630087-DI-110, Revision 1, "Gas Specification."</li></ul>
November 26, 2013	13A	Request for an Amendment of Certificate of Compliance (CoC) No. 9235 for the NAC-STC Cask to Incorporate West Valley Demonstration Project Vitrified High Level Waste and PWR 17x 17 Uncanisterized High Burnup Fuel <ul style="list-style-type: none"><li>- NAC-STC Safety Analysis Report, Revision 13A, and associated License Drawings;</li><li>- Calculation Package No. 423-2010, Revision 0, and Data Disk 1 of 1;</li><li>- Calculation Package No. 423-3000, Revision 0, and Data Disk 1 of 1; and</li><li>- High Burnup Fuel Shielding Data Disk 1 of 1.</li></ul>