



February 17, 2016
E-44531

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

Subject: Response to Request for Computer Files for Wind-Impact Thermal Analyses - Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System (Docket No. 72-1042, TAC No. L25028)

Reference: 1) Letter E-43624 from Paul Triska (AREVA Inc.) to Document Control Desk (NRC), "Revision 4 to Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System, Response to Request for Additional Information," December 18, 2015.

2) E-mail from John Nguyen (NRC) to Donis Shaw (AREVA TN), "AREVA EOS," February 12, 2016.

Reference 1 provided a response to a Request for Additional Information (RAI) for the Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System. In an e-mail transmitted to AREVA TN on February 12, 2016 (Reference 2), the NRC requested the FLUENT thermal analyses computer files used for the analyses described in the response to RAI 4-4 (Enclosures 2 and 3 of Reference 1). This submittal provides the requested FLUENT computer input and output files. Enclosure 2 provides a proprietary version of the list of computer files contained in Enclosure 3. Enclosure 4 provides a public version of this list of computer files.

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.

AREVA TN

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

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Sincerely,



Paul Triska
Vice President, Business Operations

cc: John Nguyen (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 (Proprietary Version)
3. Computer Files Associated with Certain AREVA Inc. Thermal Analyses (Proprietary)
4. Listing of Computer Files Contained in Enclosure 3 (Public Version)

Document Components:

001 Public AREVA Inc. Transmittal Letter.pdf, 691,481 bytes
002 Public Enc 1 Affidavit.pdf, 2,336,718 bytes
003 SUNSI Enc 2 List of Enc 3 files.pdf, 95,055 bytes, Proprietary
004 SUNSI Enc 3 Computer Files (folder) 39,300,646,653 bytes, Proprietary
005 Public Enc 4 List of Enc 3 files.pdf, 544,522 bytes

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

001 Public AREVA Inc. Transmittal Letter.pdf, 691,481 bytes
002 Public Enc 1 Affidavit.pdf, 2,336,718 bytes
003 SUNSI Enc 2 List of Enc 3 files.pdf, 95,055 bytes, Proprietary
004 SUNSI Enc 3 Computer Files (folder) 39,300,646,653 bytes, Proprietary
005 Public Enc 4 List of Enc 3 files.pdf, 544,522 bytes

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

001 Public AREVA Inc. Transmittal Letter.pdf, 691,481 bytes
002 Public Enc 1 Affidavit.pdf, 2,336,718 bytes
005 Public Enc 4 List of Enc 3 files.pdf, 544,522 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 Enclosures 2 and 3, which contain a listing of computer input and output files associated with certain AREVA Inc. thermal analyses and the computer files themselves. Enclosures 2 and 3 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 contained in the computer files associated with wind-impact thermal analyses for the application for approval of the spent fuel cask design for 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 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.

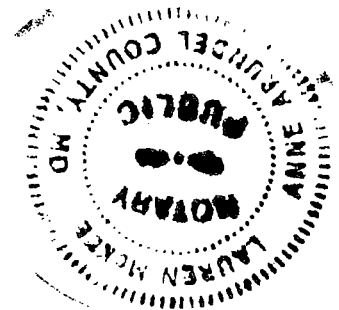
Further the deponent sayeth not.


Paul Triska
Vice President, AREVA Inc.

Subscribed and sworn before me this 17th day of February, 2016.


Notary Public
My Commission Expires

LAUREN MCKEE
Notary Public-Maryland
Anne Arundel County
My Commission Expires
February 12, 2019



Proprietary

Listing of Computer Files Contained in Enclosure 3

Disk ID No. (size)	Discipline	System/ Component	File Series (topics)	Number of files
OSM#1 Portable Hard Drive Enclosure 3 Folder Eight Subfolders (36.6 GB)	Thermal	Proprietary Information Withheld Under 10 CFR 2.390.		4
	Thermal			4
	Thermal			1
	Thermal			8
	Thermal			10

[Trade Secret]

Proprietary

Listing of Computer Files Contained in Enclosure 3

Disk ID No. (size)	Discipline	System/ Component	File Series (topics)	Number of files
	Thermal			69
OSM#1 Portable Hard Drive Enclosure 3 Folder Eight Subfolders (36.6 GB) (continued)	Thermal		Proprietary Information Withheld Under 10 CFR 2.390.	43
	Thermal			48

[Trade
Secret]

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