



March 17, 2016

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Ref: Docket# 71-9316

Alpha-Omega Services, Inc. (AOS) hereby submits the following:

1. Hard copies consisting of one each of the following: SAR Rev. H-1 pages, Certificate Drawings and a letter sent to Mr. Saverot.

AOS considers the drawings to be proprietary and request the drawings be withheld from the Public Document Room. We have also attached an affidavit for withholding this information as required by 10 CFR 2.390.

A hard and digital copy of SAR Rev. H-1 pages, Certificate Drawings, the Affidavit will be sent to Mr. Saverot.

Please contact us if you need additional information or have comments regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy Hedger", written over a horizontal line.

Troy Hedger, CEO
Alpha-Omega Services, Inc.

NM5501



Alpha-Omega Services, Inc.
Supplementary Affidavit

March 17, 2016

I, Troy Hedger, being duly sworn, depose and state as follows:

1. I am the CEO of Alpha-Omega Services, Inc. and have been delegated the function of reviewing the information described in paragraph 2, which is sought to be withheld, and have been authorized to apply for its withholding.
2. The information sought to be withheld consists of:
 - a. Alpha-Omega Services, Inc.'s drawing numbers: 105E9722, 166D8143, 166D8137, 166D8138, 105E9712, 105E9713 and 105E9719;
3. In designating material as proprietary, Alpha-Omega Services, Inc. utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it...A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information...Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by his employees and others involved in this business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that discloses an apparatus where prevention of its use by Alpha-Omega Services' competitors without license from Alpha-Omega Services constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure on resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
 - c. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;



Alpha Omega Services, Inc.

5. Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the company is limited on a "need to know" basis, and such documents at all times are clearly identified as proprietary.
6. The procedure for approval of external release of such a document is reviewed by higher level management, Project Manager, or other equivalent authority for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside of Alpha-Omega Services, Inc. are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees only in accordance with appropriate regulatory provisions or proprietary agreements.
7. The documentation mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which customarily held in confidence by Alpha-Omega Services, Inc.
8. The information mentioned in paragraph 2 provides information in support of the licensing of the AOS Transport Packaging System.
9. The information to the best of my knowledge and belief has consistently been held in confidence by Alpha-Omega Services, Inc., no public disclosure has been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
10. Public disclosure of information sought to be withheld is likely to cause substantial harm to the competitive position of Alpha-Omega Services, Inc. and deprive or reduce the availability of profit-making opportunities because:
 - a. It was developed with the expenditure of resources exceeding \$4,000,000.
 - b. Public availability of this information would deprive Alpha-Omega Services, Inc. of the ability to seek reimbursement and would permit competitors to utilize this information to Alpha-Omega Services, Inc.'s detriment.
 - c. Public availability of the information would allow competitors to obtain information at no cost which Alpha-Omega Services, Inc. developed at substantial cost. Use of this information by competitors would give them a competitive advantage over Alpha-Omega Services, Inc. by allowing competitors to design Type B packages at lower cost than Alpha-Omega Services, Inc.

The above initial evidential justification requesting that the information contained in the proprietary document be withheld from public disclosure is further supplemented by the additional following information.



Alpha-Omega Services, Inc.

Drawings 105E9722, 166D8143, 166D8137, 166D8138, 105E9712, 105E9713, and 105E9719 contain sufficiently detailed information to permit a competitor to copy the AOS Transport Packaging System design. For example, drawing 105E9722, 166D8143, 166D8137, 166D8138, 105E9712, 105E9713 and 105E9719 contain construction details for the package cask and impact limiters.

Alpha-Omega Services, Inc. feels that the information sought to be withheld is truly proprietary in nature. Public disclosure of this information, sought to be withheld, would permit Alpha-Omega Services, Inc.'s competitors in need of similar Type B packaging to construct such packaging without incurring significant development cost. This would place Alpha-Omega Services, Inc. at a competitive disadvantage in making these Type B containers available to the industry.



State of California)ss:
County of San Bernardino)

Troy Hedger, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Rancho Cucamonga, California, this 17th day of March 2016

A handwritten signature in black ink, appearing to read "Troy Hedger", is written over a horizontal line.

Troy Hedger
Alpha-Omega Services, Inc.

Subscribed and sworn before me this 17th day of March ~~2016~~
2016

Notary Public, State of California

JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

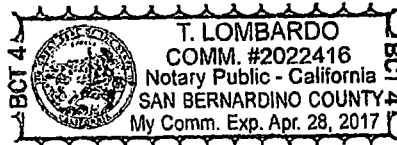
State of California

County of San Bernardino

Subscribed and sworn to (or affirmed) before me on this 17 day of March,
2016 by Troy Hedger

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

T. Lombardo
Signature (Seal)



OPTIONAL INFORMATION

DESCRIPTION OF THE ATTACHED DOCUMENT

Alpha-Omega Services, Inc.
(Title or description of attached document)
Supplementary Affidavit
(Title or description of attached document continued)

Number of Pages 4 Document Date 3/17/16

Additional information

INSTRUCTIONS

The wording of all Jurats completed in California after January 1, 2015 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain the proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and county information must be the state and county where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of the document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
 - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
 - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document with a staple.



March 16, 2016

Mr. Pierre M. Saverot, Project Manager
Division of Spent Fuel Management – Office of Nuclear Material Safety and Safeguards (NMSS)
U.S. Nuclear Regulatory Commission
Two White Flint North – Mail Stop T4-B34
11545 Rockville Pike
Rockville, MD 20852-2738

SUBJECT: REQUEST TO AMEND CERTIFICATE OF COMPLIANCE USA/9316/B(U)-96

Reference: Docket No. 71-9316

Mr. Saverot:

Further to our Part 21 Report dated August 5, 2015, as supplemented August 7 and 16, 2015, Alpha-Omega Services, Inc. (AOS) requests an amendment to Certificate of Compliance (C of C) USA/9316/B(U)-96. The revision to the SAR incorporates revised Shielding Analysis in Chapter 5. At the same time, we propose to amend the following items that are specified on the C of C or in the supporting documentation.

These changes include the following:

1. We propose to change the SAR to update to add new isotope, Ir-194;
2. We propose changes communicated to NRC in letters dated April 4, May 14, and September 26, 2013; and May 6, June 5, and August 5, 2015; and
3. We propose to apply miscellaneous updates and corrections.

These items are identified as SAR FM9054 Revision H-1 dated March 11, 2016 in the accompanying pages. The proposals are identified in the table of changes included with this letter as a part of the submittal.

Along with this letter AOS submits the following:

1. Two (2) USB Flash Drives containing a digital copy of this letter, SAR changes identified as Revision H-1 and Certificate Drawings and the data files to support MCNP analysis in Chapter 5.
2. One (1) Hard copy of the SAR changes identified as Revision H-1
3. One (1) Set of Certificate Drawings, the affidavit to withhold the drawings from the Public Document Room as required by 10 CFR 2.390.

A hard copy of the SAR Revision H-1 pages, Certificate Drawings, the affidavit and this letter will be sent directly to the US Nuclear Regulatory Commission Attn: Document Control Desk.

REQUEST TO AMEND CERTIFICATE OF COMPLIANCE USA/9316/B(U)-96

DOCKET NO. 71-9316

We hope that the preceding is in accordance with your understanding. If you have any questions, please feel free to contact us.

Best Regards,



Troy Hedger, President
Alpha - Omega Services, Inc.

Attachments:

Table of Changes – AOS Transport Packaging; AOS-025A, AOS-050A, and AOS-100; AOS FM9054, Rev. H-1 Changes – March 11, 2016 (11 pages)

SAR FM9054 Revision H-1 pages (125 pages)

DAHER-TLI CN-15008-501MCNP Folder containing MCNP Input/Output Data Files (USB Flash Drive)

AOS Affidavit for withholding from public records (re: certification drawings)

Certification Drawing Numbers: 166D8142 Rev I, 105E9722 Rev I, 166D8143 Rev H, 183C8485 Rev H, 105E9718 Rev I, 166D8138 Rev I, 166D8137 Rev H, 183C8519 Rev. A, 105E9711 Rev I, 105E9713 Rev J, 105E9712 Rev J, 105E9719 Rev J, 183C8491 Rev I, 183C8518 Rev. A