



E-45736
July 20, 2016

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

Subject: Submittal of a Consolidated Version of NUH09.101, "NUHOMS® -MP197 Transportation Package Safety Analysis Report," Revision 17

Reference: Docket No. 71-9302, Certificate of Compliance No. 9302, NUHOMS® -MP197 Transportation System

The April 28, 2016 Part 72 Docket No. 72-1050 application by Waste Control Spec incorporated by reference the U.S. Nuclear Regulatory Commission's (NRC's) approval of AREVA Inc. NUHOMS® -MP197 Transportation Package System. Noting that the Safety Analysis Report (SAR) for this system is contained in a number of regulatory submittals, the NRC Staff recently requested that a consolidated updated proprietary SAR be submitted to the NRC such that it may be incorporated into ADAMS to facilitate agency review.

Accordingly, AREVA Inc. provides this submittal of a consolidated updated proprietary SAR for the NUHOMS® -MP197 Transportation Package System, Docket No. 71-9302. This consolidated updated SAR is based on AREVA Inc.'s system for maintaining the SAR current and is complete and accurate to the best of our knowledge, information and belief. The materials to be docketed are being provided in hard copy. Courtesy electronic copies have previously been provided.

This submittal includes proprietary information, which has all been previously submitted on this docket. In accordance with 10 CFR 2.390, an affidavit (Enclosure 1) is provided specifically requesting that you continue to withhold this proprietary information from public disclosure. Because the purpose of this submittal is to provide a consolidated proprietary version of this SAR, not associated with any Docket No. 71-9302 licensing action, and since public versions of the information are already on the docket, a public version is not included herein.

Should you have any questions regarding this submittal, please contact Don Shaw at 410-910-6878.

Sincerely,

A handwritten signature in black ink that reads "Jayant Bondre".

Jayant Bondre
Vice President, Chief Technical Officer

AREVA TN

*NMSS 26
NMSS 01*

cc: John Nguyen (NRC SFM) (cover letter only)

Enclosures:

1. Affidavit pursuant to 10 CFR 2.390
2. NUH09.101, "NUHOMS[®] -MP197 Transportation Package Safety Analysis Report," Revision 17 (Proprietary)*

*(Enclosure 2 is contained in ten three-ring binders)

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

AREVA Inc.)
State of Maryland) SS.
County of Howard)

I, Jayant Bondre, 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 2 and is listed below:

- Portions of Enclosure 2 – NUH09.101, “NUHOMS® -MP197 Transportation Package Safety Analysis Report,” Revision 17

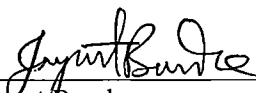
This document has been appropriately designated as proprietary.

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 design and licensing details included in the safety analysis report associated with the Docket 71-9302 NUHOMS® -MP197 Transportation Package, 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 details associated with the design and analysis of a radioactive material transportation 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.


Jayant Bondre
Vice President, AREVA Inc.

Subscribed and sworn to me before this 20th day of July 2016.


Notary Public
My Commission Expires 10/16/19

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