



August 11, 2016

DPG 16-198

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Docket No. 72-11
Rancho Seco Independent Spent Fuel Storage Installation
License No. SNM-2510

Submittal of a Consolidated Version of the Rancho Seco Independent Spent Fuel Storage Installation Final Safety Analysis Report (FSAR) Revision 4

The April 28, 2016 Part 72 application by Waste Control Specialists incorporated by reference the U.S. Nuclear Regulatory Commission's (NRC's) approval of the Rancho Seco Independent Spent Fuel Storage Installation. Noting that the Final Safety Analysis Report (FSAR) through Revision 4 as referenced, for this installation is contained in a number of regulatory submittals [some of which may pre-date NRC's ADAMS electronic document management system], the NRC Staff recently requested that a consolidated updated proprietary FSAR be submitted to the NRC such that it may be incorporated into ADAMS to facilitate agency review.

Accordingly, SMUD provides this submittal of a consolidated proprietary FSAR, Revision 4, for the Rancho Seco Independent Spent Fuel Storage Installation, Docket No. 72-11. This consolidated FSAR Revision 4 is based on SMUD's system for maintaining the FSAR current and is complete and accurate to the best of our knowledge, information and belief based on the April 28, 2016 application date referenced above. 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 FSAR, not associated with any Docket No. 72-11 licensing action, and since public versions of the information are already on the docket, a public version is not included herein.

NM5526

If you or members of your staff have questions or require additional information, please contact me by email at dan.tallman@smud.org or by phone at (916) 732-4893.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan A. Tallman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dan A. Tallman
Manager, Rancho Seco Assets

Cc: (without enclosures)
William Allen: Program Manager Part 72
Jack Parrot: Program Manager Part 50

Enclosures:

- 1) Affidavit pursuant to 10 CFR 2.390
- 2) Rancho Seco Independent Spent Fuel Storage Installation Final Safety Analysis Report (FSAR) Revision 4 (proprietary)

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 that 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 listed below:

File Number	Revision No.	Calculations	Title
2069.0200	0	NUHOMS MP-187 FO-DSC 10 CFR 72 Structural Analysis	
2069.0201	3	NUHOMS MP-187 FC-DSC 10 CFR 72 Structural Analysis	
2069.0202	2	SMUD HSM 10 CFR 72 Structural Analysis – Pre-fab. Modules for Onsite conditions	
2069.0203	2	NUHOMS MP-187 Cask 10 CFR 72 Structural Analysis – NDP Cask for Onsite Load Conditions	
2069.0204	7	NUHOMS MP-187 Guide Sleeve Structural Analysis	
2069.0205	3	NUHOMS MP-187 FF-DSC 10 CFR 72 Structural Analysis	
2069.0214	2	Cask/HSM Restraint System Structural Analysis	
2069.0216	3	Rancho Seco NUHOMS Short Cavity (FO) Dry Shielded Canister Shell Assembly Structural Analysis	
2069.0217	0	FO/FC Dry Shielded Canister Basket Assembly Structural Analysis	
2069.0219	2	Long Cavity (FC/FF) Dry Shielded Canister Shell Assembly Structural Analysis	
2069.0220	5	Lead Shield Plug Evaluation for SMUD FC/FF DSC Calculation	
2069.0400	3	Rancho Seco HSM Thermal Analysis	
2069.0401	4	MP-187 Cask Thermal Analysis for Onsite Transfer and Storage Conditions	
2069.0402	1	Fire Analysis for the Rancho Seco ISFSI During Transfer, Loading, and Storage Operations	
NUH005.0450	0	Dry Storage Clad Temperature Acceptance Limit for Rancho Seco Fuel Assemblies	
2069.0453	4	MP-187 Cask Peak Pressure Calculation for DSC Cavity and Cask DSC Annulus During Storing DSC	
2069.0500	1	Radiological Source Term Calculation for Rancho Seco Fuel	
2069.0501	2	Rancho Seco	
2069.0502	4	Rancho Seco Site Dose Calculation	
2069.0503	3	Rancho Seco Occupational Exposure Calculation	
2069.0505	2	Rancho Seco Fission Gas Release Dose Assessment	
2069.0507	0	Rancho Seco NUHOMS DSC Confinement Evaluation	

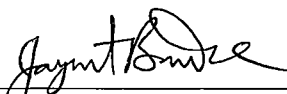
Drawing Number	Revision No.	Drawings	Title
NUH-05-4001	15	NUHOMS MP-187 Multi-purpose Cask Main Assembly (six sheets)	
NUH-05-4003	10	NUHOMS MP-187 Multi-purpose Cask Onsite Transfer Arrangement (two sheets)	
NUH-05-4004	16	NUHOMS FO-DSC and FC-DSC for PWR Fuel Main Assembly (four sheets)	
NUH-05-4005	14	NUHOMS FF-DSC for PWR Fuel Main Assembly (four sheets)	

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 calculations and drawings which are owned and 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 descriptions of the design and safety analysis of dry spent fuel storage systems, the application of which provides 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 before me this 2nd day of August, 2016.



 Notary Public
 My Commission Expires 10/16/19

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