



August 31, 2016
E-46110

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

Subject: Submittal of Specific Consolidated NUHOMS[®]-MP197 Transportation Package Safety Analysis Report Chapters, Revision 17A, Docket No. 71-9302

Reference : Letter E-45091, dated August 16, 2016, Application for Revision 8 to Certificate of Compliance No. 9302 for the Model No. NUHOMS[®]-MP197 Packaging, Docket No. 71-9302

Based on communication with the NRC and in support of Letter E-45091 referenced above, AREVA Inc. submits, herewith, a consolidated copy of the NUHOMS[®]-MP197 Transportation Package Safety Analysis Report (SAR), Revision 17A, Appendix A.1.4.8, Appendix A.1.4.9, Appendix A.2.13.11, Chapter A.3, and Chapter A.5.

This submittal contains the following enclosures:

- Enclosure 1 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that you withhold proprietary information included in Enclosure 2 of this submittal from public disclosure. That information may not be used for any purpose other than to support the review of the application for revision to the NUHOMS[®]-MP197 Packaging Certificate of Compliance.
- Enclosure 2 provides a consolidated copy of the NUHOMS[®]-MP197 Transportation Package SAR, Revision 17 A, Appendix A.1.4.8, Appendix A.1.4.9, Appendix A.2.13.11, Chapter A.3, and Chapter A.5. This enclosure is proprietary.
- Enclosure 3 provides a consolidated copy of the NUHOMS[®]-MP197 Transportation Package SAR, Revision 17A, Appendix A.1.4.8, Appendix A.1.4.9, Appendix A.2.13.11, Chapter A.3, and Chapter A.5. This enclosure is non-proprietary.

The changed areas in the SAR are marked as follows:

- New or changed pages show "Revision 17A" in the header.
- Changed areas are indicated using revision bars in the right-hand margin. Newly inserted text is shown by italics.

NMSSDI

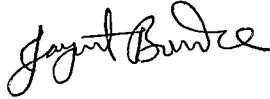
AREVA TN

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

Should NRC staff have any questions or require additional information to support review of this application, please contact Mr. Glenn Mathues by telephone at 410-910-6538, or by e-mail at Glenn.Mathues@areva.com.

Sincerely,



Jayant Bondre
Vice President, Chief Technical Officer

cc: Pierre M. Saverot (NRC SFM) as follows:

- One paper copy of this transmittal letter
- One electronic copy of this transmittal letter and Enclosures 1 and 2 on one DVD

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. NUHOMS[®]-MP197 Transportation Package Safety Analysis Report, Revision 17A Consolidated Appendix A.1.4.8, Appendix A.1.4.9, Appendix A.2.13.11, Chapter A.3, and Chapter A.5 (Proprietary)
3. NUHOMS[®]-MP197 Transportation Package Safety Analysis Report, Revision 17A Consolidated Appendix A.1.4.8, Appendix A.1.4.9, Appendix A.2.13.11, Chapter A.3, and Chapter A.5 (Non-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 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, as listed below:

- Enclosure 2 - NUHOMS®-MP197 Transportation Package Safety Analysis Report, Revision 17A, Consolidated Appendix A.2.13.11, portions of Consolidated Chapter A.3, and portions of Consolidated Chapter A.5


These documents 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 portions of the Model NUHOMS®-MP197 transportation package safety analysis report related to the design of the NUHOMS®-MP197 transportation packaging, 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 is related to the design of the NUHOMS®-MP197 transportation packaging, 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 31st 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