



HITACHI

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Proprietary Information Notice

Attachment 4 to this letter contains company ~~proprietary information to be withheld from public disclosure in accordance with 10CFR2.390~~. Upon removal of Attachment 4, the balance of this letter may be made public.

M170151

July 6, 2017

Bernard White, Project Manager
Spent Fuel Licensing Branch
Division of Spent Fuel Management
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk

Subject: GEH Model 2000 Package Letter Authorization Revision Request

References:

- 1) Model No. 2000 Shipping Cask-Certification Number 9228 Rev. 26, Docket Number 71-9228, Package Identification USA/9228/B(U)F-96
- 2) GEH Model 2000 Package Authorization Request, 12/12/14 (ML14351A508)
- 3) GEH Model 2000 Package Revised Authorization Request, 9/25/15 (ML15268A483, ML15268A480, ML15268A474, ML15268A456, ML15268A449, ML15268A437, ML15268A438)
- 4) GEH Model 2000 Package Revised Authorization Request, 10/16/15 (ML15289A176, ML15289A177)
- 5) GEH Model 2000 Package Authorization Request Revised Pages and RAJ Responses, 1/15/16 (ML15268A437, ML15268A438, ML15268A449, ML15268A451, ML15268A456, ML15268A474, ML15268A480, ML15268A483)
- 6) NRC Authorization for Shipment of the Model 2000 Package Using High Performance Insert, 2/11/16 (ML16043A018)
- 7) GEH Request for Renewal- Certificate of Compliance (CoC) No. 9228 for the Model 2000 Package, 4/28/16
- 8) GEH Model 2000 Package Letter Authorization Request, 6/25/16 (ML15289A176, ML15289A177)
- 9) NRC Authorization for Shipment of Model 2000 Package Using High Performance Insert, 1/23/17

Dear Mr. White:

GE Hitachi Nuclear Energy (GEH) hereby submits a request to revise an NRC letter authorization for the Model No. 2000 package issued January 23, 2017 (Reference 9). This approval allows use of Configuration 1 for the shipment of Co-60 source rods with a decay heat range between 0 and 1500 watts to the GEH Vallecitos Nuclear Center in Sunol, California.

A revision to this letter authorization is needed because certain conditions and timeframe of upcoming Co-60 transports is not supported by the current authorization. GEH requests an update to the current letter authorization issued by July 28, 2017 to include changes to the authorization conditions described in Attachment 2 and drawing revisions described in Attachment 3. The revised licensing drawings are provided as Attachment 4 to this letter.

USNRC
M170151
July 6, 2017

The next Co-60 shipment using the Model 2000 package is scheduled for August 2017 and additional shipments are expected through March 31 2018. For this reason, GEH also requests NRC revise the current authorization expiration date from August 31 2017 through March 31 2018 or until the Model 2000 package Certificate of Compliance (CoC) is renewed, whichever occurs first.

Please contact Ted Draffen at (910) 819-5760 or me if there are any questions regarding this request.

Sincerely,



Scott P. Murray, Manager
Facility Licensing

Commitments: None

Attachments:

1. Affidavit
2. Model 2000 Letter Authorization Revised Condition Change Table
3. Model 2000 Letter Authorization Revised Drawing Change Table
4. Revised Licensing Drawings (001N8422G001, Rev 3, 001N8423G001, Rev 2, 001N8424G001, Rev 2, 001N8425G001, Rev 2, 001N8427G001, Rev 2, 001N8428G001, Rev 2) (Contains GEH Proprietary Information)

Cc: J. Mckirgan, NRC SFM
W. Allen, NRC SFM
SPM 17-022

Attachment 1

AFFIDAVIT

I, **Scott P. Murray**, state as follows:

- (1) I am the Manager, Facility Licensing of GE-Hitachi Nuclear Energy (GEH) and have been delegated the function by GEH 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 is contained in Attachment 4 to GEH's letter, M170151, Scott P. Murray to Bernard White, Spent Fuel Licensing Branch entitled GEH Model 2000 Package Letter Authorization Revision Request. GEH proprietary information is contained in Attachment 4, and is identified by the statement "GE Hitachi Proprietary Information".
- (3) In making this application for withholding of proprietary information of which it is the owner or licensee, GEH relies upon the exemption from disclosure set forth in the Freedom of Information Act (FOIA), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), and 2.390(a)(4) for trade secrets (Exemption 4). The material for which exemption from disclosure is here sought also qualifies under the narrower definition of trade secret, within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975 F2d 871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704 F2d 1280 (DC Cir. 1983).
- (4) The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (4)a. and (4)b. Some examples of categories of information that fit into the definition of proprietary information are:
 - a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by GEH's competitors without license from GEH constitutes a competitive economic advantage over GEH and/or other companies.
 - b. Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
- (5) To address 10 CFR 2.390(b)(4), the information sought to be withheld is being submitted to the NRC in confidence. The information is of a sort customarily held in confidence by GEH, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GEH, not been disclosed publicly, and not been made available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary and/or confidentiality agreements that provide for maintaining the information in confidence. The initial designation of this information as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure are as set forth in the following paragraphs (6) and (7).
- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, who is the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge, or who is the person most likely to be subject to the terms under which it was licensed to GEH. Access to such documents within GEH is limited to a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist, or other equivalent authority for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GEH are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary and/or confidentiality agreements.

Attachment 2

Changes Affecting Model 2000 Letter Authorization Request Condition			
Condition	Condition Description	Description of Change	Reason for Change
8	The acceptance tests and maintenance program of the package shall require confirmatory gamma scan of the HPI.	Added confirmatory gamma scan of the HPI	Post-fabrication assurance
9	The HPI and HPI Material Basket shall be constructed and assembled in accordance with Drawing No. 001N8422G001, Rev. 3, "GE 2000 HPI and Material Basket Licensing Drawing," Drawing No. 001N8423G001, Rev. 2, "GE 2000 HPI Licensing Drawing," Drawing No. 001N8424G001, Rev. 2, "GE 2000 HPI Material Basket Assembly Licensing Drawing," Drawing No. 001N8425G001, Rev. 2, "GE 2000 HPI Body Licensing Drawing," Drawing No. 001N8427G001, Rev. 2, "GE 2000 Top Plug Assembly Licensing Drawing," and Drawing No. 001N8428G001, Rev. 2, "GE 2000 HPI Bottom Plug Assembly Licensing Drawing."	Updated drawing revisions	See Attachment 3

Attachment 3

Changes Affecting Model 2000 Letter Authorization Request Drawings		
Drawing Number	Drawing Description	Reason for Change (changes indicated on drawing per revision change number)
001N8422G001, Rev. 3 001N8423G001, Rev. 2 001N8424G001, Rev. 2 001N8425G001, Rev. 2 001N8427G001, Rev. 2 001N8428G001, Rev. 2	GE 2000 HPI and Material Basket Licensing Drawing GE 2000 HPI Licensing Drawing GE 2000 HPI Material Basket Assembly Licensing Drawing GE 2000 HPI Body Licensing Drawing GE 2000 Top Plug Assembly Licensing Drawing GE 2000 HPI Bottom Plug Assembly Licensing Drawing	<p>Requirement for confirmatory gamma scan of the HPI added.</p> <p>Dimensions and tolerances changed to reflect as-fabricated components</p> <p>Drawing notes updated to reflect as-fabricated condition/process</p> <p>Weld design and weld fabrication ASME code compliance changed based on associated supplemental engineering evaluations</p> <p>Item numbering changed to reflect as-fabricated DU</p> <p>Component weights removed</p> <p>HPI to material basket axial and radial gap requirement removed</p> <p>Changes to the importance of safety classification of welds to reflect as-fabricated conditions and supported by supplemental engineering evaluations</p>