



E-49815  
September 26, 2017

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

Subject: Supplemental Information; Additional Computer Files for the Structural Analysis for the Model No. TN-RAM, Docket No. 71-9233

Reference: Letter E-48635, Dated July 10, 2017, Application for Revision 15 to Certificate of Compliance No. 9233 for the Model No. TN-RAM, Docket No. 71-9233

Based on communication with the U.S. Nuclear Regulatory Commission (NRC), and in support of the application in the reference above, TN Americas LLC submits the additional structural computer files requested.

This submittal contains the following enclosures:

- Enclosure 1 provides a listing of the computer files contained in Enclosure 2.
- Enclosure 2 is a portable hard drive containing the additional computer files for the structural analysis of the TN-RAM.
- Enclosure 3 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that the proprietary information included in Enclosure 2 of this submittal be withheld from public disclosure, and that information may not be used for any purpose other than to support the review of the application for revision to the TN-RAM Certificate of Compliance. Since Enclosure 2 is entirely proprietary, there is no corresponding non-proprietary version provided.

Should you or your 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.

Sincerely,

W. Scott Edwards  
Director of Transportation

Enclosure:

1. Listing of Computer Files Contained in Enclosure 2
2. One electronic copy (portable hard drive) of the Computer Files (Proprietary)
3. Affidavit Pursuant to 10 CFR 2.390

**TN AMERICAS LLC**

7135 Minnetonka Way, Suite 300, Columbia, Maryland 21045  
Tel.: 410 910 6900 - Fax: 410 910 6902 - www.us.aveva.com/AREVATN

PM has the hard drive

NMSSDI

cc: John Vera, U.S. Nuclear Regulatory Commission

- One copy of this letter and Enclosures 1 and 3)
- One electronic copy (portable hard drive) of the Computer Files (Enclosure 2)

**Enclosure 1 to E-49815**

**Listing of Computer Files  
Contained in Enclosure 2**

Listing of Computer Files Contained in Enclosure 2  
(All files are Proprietary)

| Disk ID No.<br>(size)   | Discipline | System            |  | File Series (topics)  | Number<br>of files                 |     |
|---|------------|-------------------|--|---|------------------------------------|-----|
| Enclosure 2<br>One Portable<br>Hard Drive<br>(480 GB)<br>Note: A<br>directory<br>listing of all<br>the files is<br>included as<br>"Directory.txt" | Structural | TN-RAM<br>LS-DYNA | TN-RAM LS-<br>DYNA Model<br>Development and<br>Benchmarking:<br><br>(CN-16001-201<br>Rev. 1 Input and<br>Output Files) | End Drop Benchmark  | 141                                |     |
|   |            |                   |  | Side Drop Benchmark   | 2019                               |     |
|   |            |                   | Corner   | TN-RAM LS-<br>DYNA<br>Perpendicular<br>Wood Crush<br>Strength<br>Sensitivity<br>Studies:<br><br>(CN-16001-202<br>Rev. 1 Input and<br>Output File) | Corner Drop -50%<br>Crush Strength | 192 |
|   |            |                   |  |   | Corner Drop Nom.<br>Crush Strength | 192 |
|   |            |                   |  |   | Corner Drop +50%<br>Crush Strength | 192 |
|   |            |                   | End  | End Drop -50% Crush<br>Strength   | 141                                |     |
|   |            |                   |  | End Drop Nom. Crush<br>Strength   | 142                                |     |
|   |            |                   |  | End Drop +50% Crush<br>Strength   | 142                                |     |
|   |            |                   | Side   | Side Drop -50% Crush<br>Strength  | 1020                               |     |
|   |            |                   |  | Side Drop Nom. Crush<br>Strength  | 1021                               |     |
| Side Drop +50%<br>Crush Strength  | 1021       |                   |  |   |                                    |     |

**AFFIDAVIT PURSUANT  
TO 10 CFR 2.390**

TN Americas LLC                    )  
State of Maryland            )    SS.  
County of Howard                )

I, Jayant Bondre, depose and say that I am Chief Technical Officer of TN Americas LLC, 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 meets the provisions of paragraph (a) (4) of Section 2.390 of the Commission's regulations. The information is contained in Enclosure 2, as listed below:

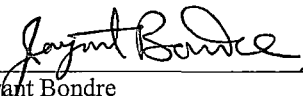
- Enclosure 2 – A portable hard drive containing computer files associated with the analyses of the TN-RAM

I have personal knowledge of the criteria and procedures utilized by TN Americas LLC in designating information as a trade secret, privileged or as confidential commercial or financial information.

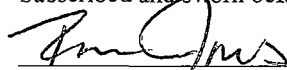
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves portions of the TN-RAM transportation packaging SAR, related to the design and analysis of the TN-RAM transportation packaging, which are owned and have been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN Americas LLC, and not customarily disclosed to the public. TN Americas LLC 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 TN Americas LLC, because the information is related to the design and analysis of the TN-RAM 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 TN Americas LLC, take marketing or other actions to improve their product's position, or impair the position of TN Americas LLC's product, and avoid the development of similar data and analyses in support of their processes, methods, or apparatus.

Further the deponent sayeth not.

  
Jayant Bondre  
Chief Technical Officer, TN Americas LLC

Subscribed and sworn before me this 26<sup>th</sup> day of September 2017.

  
\_\_\_\_\_  
Notary Public

My Commission Expires 10/16/19

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