



Portland General Electric Company

Trojan ISFSI
71760 Columbia River Hwy
Rainier, Oregon 97048

September 26, 2017
VPN-009-2017

Trojan ISFSI
License SNM-2509
Docket 72-017

ATTN: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Trojan Site-Specific Independent Spent Fuel Storage Installation (ISFSI)
License Change Application (LCA) 72-07, License Renewal Supplemental Information

By letter dated March 23, 2017, Letter No. VPN-004-2017, Portland General Electric Company (PGE) submitted its application for renewal of the Trojan site-specific Independent Spent Fuel Storage Installation license. This letter provides information in the form of drawings to supplement the March 23, 2017 submittal.

The drawings were requested by NRC staff to support their review of the Trojan ISFSI license renewal application. They are included as Attachments 1 and 2 to this letter.

Attachment 1 contains a copy of Packaging Technology, Inc. Drawing D-AI-200, Revision 4 (Footing Installation, Fuel Transfer Station, Trojan ISFSI), which is considered to be non-proprietary.

Attachment 2 contains the following Holtec International drawings:

- 3663, Revision 13, MPC 24EF Trojan Enclosure Vessel
- 3490, Revision 6, MPC-24E/EF Trojan Fuel Basket
- 3555, Revision 11, Hi-Trac 100 Ton Trojan Transfer Cask Assembly

These drawings contain information that is proprietary to Holtec, the designers of the Trojan ISFSI Multi-Purpose Canisters and Transfer Cask. In accordance with 10 CFR 2.390 (Public Inspection, Exemptions, Requests for Withholding) PGE requests the drawings be withheld from public disclosure. Each item of proprietary information is supported by an affidavit signed by Holtec International, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC.

If you have any questions, please contact Mark Tursa of my staff at 503-556-7030.

Sincerely,

Bradley Y. Jenkins
Vice President, Power Supply Generation

Attachments

c: w/o attachments

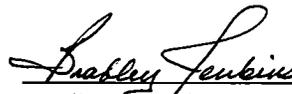
C. Markley, NRC, NMSS/DSFM/RMB
K. Banovac, NRC, NMSS/DSFM/RMB
Director, DNMS, NRC Region IV
T. Cornett, ODOE
Chairman, Columbia County Commissioners

NMSS20
NMSS26

State of Oregon,)
)
)
County of Multnomah)

I, Bradley Y. Jenkins, being duly sworn, subscribe to and say that I am the Vice President, Power Supply Generation for Portland General Electric Company, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

Date September 28, 2017



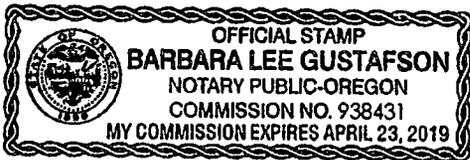
Bradley Y. Jenkins
Vice President, Power Supply Generation

On this day appeared before me Bradley Y. Jenkins, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act.

GIVEN under my hand and seal this 28 day of September 2017.



Notary Public in and for the State of Oregon



Residing at Multnomah County
My commission expires April 23, 2019

Attachment 1

To

VPN-009-2017

AFFIDAVIT PURSUANT TO 10 CFR 2.390

I, Kimberly Manzione, being duly sworn, depose and state as follows:

- (1) I have reviewed the information described in paragraph (2) which is sought to be withheld, and am authorized to apply for its withholding.
- (2) The information sought to be withheld is Holtec Drawing Numbers 3663, 3490, and 3555, which contain Holtec Proprietary information.
- (3) In making this application for withholding of proprietary information of which it is the owner, Holtec International 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 10CFR Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is here sought is all "confidential commercial information", and some portions also qualify 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, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).

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- (4) Some examples of categories of information which 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 Holtec's competitors without license from Holtec International constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
 - c. Information which reveals cost or price information, production, capacities, budget levels, or commercial strategies of Holtec International, its customers, or its suppliers;
 - d. Information which reveals aspects of past, present, or future Holtec International customer-funded development plans and programs of potential commercial value to Holtec International;
 - e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 4.a, 4.b, and 4.e above.

- (5) The information sought to be withheld is being submitted to the NRC in confidence. The information (including that compiled from many sources) is of a sort customarily held in confidence by Holtec International, 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 Holtec International. No public disclosure has been made, and it is not 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 agreements which provide for maintenance of the information in confidence. Its initial designation as

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proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.

- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within Holtec International is limited on 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, by the manager of the cognizant marketing function (or his designee), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside Holtec International 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 agreements.
- (8) The information classified as proprietary was developed and compiled by Holtec International at a significant cost to Holtec International. This information is classified as proprietary because it contains detailed descriptions of analytical approaches and methodologies not available elsewhere. This information would provide other parties, including competitors, with information from Holtec International's technical database and the results of evaluations performed by Holtec International. A substantial effort has been expended by Holtec International to develop this information. Release of this information would improve a competitor's position because it would enable Holtec's competitor to copy our technology and offer it for sale in competition with our company, causing us financial injury.

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- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to Holtec International's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of Holtec International's comprehensive spent fuel storage technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology, and includes development of the expertise to determine and apply the appropriate evaluation process.

The research, development, engineering, and analytical costs comprise a substantial investment of time and money by Holtec International.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

Holtec International's competitive advantage will be lost if its competitors are able to use the results of the Holtec International experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to Holtec International would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive Holtec International of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

U.S. Nuclear Regulatory Commission
Affidavit Pursuant to 10CFR2.390
Supporting Trojan ISFSI License Renewal

AFFIDAVIT PURSUANT TO 10 CFR 2.390

STATE OF NEW JERSEY)
)
COUNTY OF CAMDEN) ss:

Kimberly Manzione, being duly sworn, deposes and says:

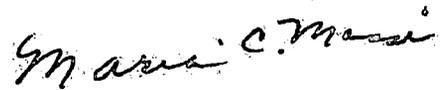
That she has read the foregoing affidavit and the matters stated therein are true and correct to the best of her knowledge, information, and belief.

Executed at Camden, New Jersey, this 13th day of September, 2017.



Kimberly Manzione
Licensing Manager
Holtec International

Subscribed and sworn before me this 13th day of September, 2017.



MARIA C. MASSI
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 25, 2020