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January 29, 2018 E-50676

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

Subject:

Certificate of Compliance No. 9233 for the Model No. TN-RAM,

Docket No. 71-9233, Safety Analysis Report for the TN-RAM,

Revision 17

References: [1] Revision 15 to Certificate of Compliance No. 9233 for the Model

No. TN-RAM, 2017

[2] Letter E-50023, dated October 16, 2017, Application for Revision 16 to Certificate of Compliance No. 9233 for the Model No. TN-RAM,

Docket No. 71-9233

In support of the issuance of Revision 16 to Certificate of Compliance (CoC) No. 9233 for the Model Number TN-RAM, TN Americas LLC has consolidated the TN-RAM Safety Analysis Report (SAR), resulting in Revision 17.

Enclosure 1 provides a consolidated copy of Revision 17 of the SAR. This enclosure is proprietary. Enclosure 2 is a consolidated copy of a public version of Revision 17 of the SAR. Enclosure 3 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that you withhold proprietary information included in Enclosure 1 of this submittal from public disclosure.

As a consolidated SAR, each page of Revision 17 reflects the revision number for which the most recent changes to the pages were incorporated, with the revision number in the page header and the changed areas indicated using a revision bar in the right-hand margin and the new or changed text shown in italic.

Should NRC staff have any questions or require additional information regarding this submittal, please do not hesitate to contact Mr. Glenn Mathues at 410-910-6538, or me at 509-375-8161. For any written correspondence please include "To the Attention of Glenn A. Mathues.".

NMSSON

Sincerely,

W. Scott Edwards **Director of Transportation**

Enclosure:

TN-RAM SAR Revision 17; (Proprietary)
TN-RAM SAR Revision 17; (Non-Proprietary)
Affidavit Pursuant to 10 CFR 2.390

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

One electronic copy (computer disk) of this letter and Enclosures 1 and 3)

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 1 as listed below:

• Enclosure 1 - Portions of chapters and appendices of the Safety Analysis Report (SAR) for the TN-RAM, Revision 17

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.

Hayant Bondre

Chief Technical Officer, TN Americas LLC

Subscribed and sworn before me this 29th day of January 2018.

Notary Public

My Commission Expires 10 /16 / 19

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