

February 12, 2018

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Submission of a Revised License Drawing for Request to Amend the U.S. Nuclear Regulatory Commission Certificate of Compliance No. 1025 for the NAC-MPC® Cask System

Docket No. 72-1025

- References:
1. U.S. Nuclear Regulatory Commission (NRC) Certificate of Compliance (CoC) No. 1025 for the NAC International Multi-Purpose Cask (MPC) System, Amendment No. 6, October 18, 2010
 2. NAC-MPC System Final Safety Analysis Report (FSAR), Revision 10, NAC International, January 2014
 3. ED20170083, Submission of a Request to Amend the U.S. Nuclear Regulatory Commission Certificate of Compliance No. 1025 for the NAC-MPC® Cask System, November 14, 2017

NAC International (NAC) hereby submits revised license drawing 630045-866, Revision 4 to supplement Reference 3. Previously NAC only submitted an internal Design Change Request (DCR(L)) 630045-866-2A within Enclosure 5, which detailed the change in lieu of providing a revised drawing. This was done because information had been added to the drawing to support the NRC review of the Waste Control Specialists (WCS) centralized interim storage facility (CISF) site-specific license application and had not yet been approved. Since this application review has been suspended NAC has revised the drawing to show only details previously approved by the NRC plus the information requested to be added in this amendment request. Which are details for the screen mesh size for the concrete overpack. Since convective cooling is not required, NAC is requesting a finer mesh to further prevent the entrance of foreign objects.

Consistent with NAC administrative practice, this proposed FSAR revision is numbered to uniquely identify the applicable changed pages. Revision bars mark the FSAR text changes on the Revision 18A pages. The included List of Effective Pages identifies the revision level of all pages in the Reference 2 FSAR with Revision 18A pages.

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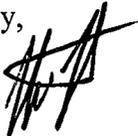
In order to better facilitate the review process, NAC is providing the Revision 18A change pages with appropriate backing pages. In accordance with NAC's administrative practices, upon final acceptance of this application, the 17A and 18A changed pages will be reformatted and incorporated into the next revision of the NAC-MPC FSAR.

Enclosure 1 contains a list of changes, which are reflected on the SAR Revision 18A changed pages. Enclosure 2 contains a detailed list of drawing changes and their current revision level. Enclosure 3 contains the SAR changed pages, Revision 18A, and an updated List of Effective Pages (LOEP) for the submittal. Enclosure 4 contains proprietary NAC calculations used to support the amendment request.

This submittal package includes one proprietary and non-proprietary version, including this transmittal letter, attached affidavit (Attachment 1) and Enclosures 1 thru 5. The proprietary information is labeled "NAC PROPRIETARY INFORMATION". In accordance with 10 CFR 2.390 this information it to be withheld from public disclosure.

If you have any comments or questions, please contact me on my direct line at 678-328-1236.

Sincerely,



Wren Fowler
Director, Licensing
Engineering

Attachment:

Attachment 1 – NAC International Affidavit Pursuant to 10 CFR 2.390

Enclosures:

Enclosure 1 – List of FSAR Changes for, NAC-MPC FSAR, 18A

Enclosure 2 – List of Drawing Changes for, NAC-MPC, 18A

Enclosure 3 – FSAR Changed Pages and LOEP for, NAC-MPC FSAR, 18A

Enclosure 4 – Additional Information and Supporting documents for, NAC-MPC FSAR, 18A

Attachment 1

**NAC International Inc.
Affidavit Pursuant to 10 CFR 2.390**

NAC INTERNATIONAL
AFFIDAVIT PURSUANT TO 10 CFR 2.390

George Carver (Affiant), Vice President, Engineering and Licensing, of NAC International Inc., hereinafter referred to as NAC, at 3930 East Jones Bridge Road, Norcross, Georgia 30092, being duly sworn, deposes and says that:

1. Affiant has reviewed the information described in Item 2 and is personally familiar with the trade secrets and privileged information contained therein, and is authorized to request its withholding.
2. The information to be withheld includes the following NAC Proprietary Information that is being provided in support the technical review of NAC's Request for a Certificate of Compliance (CoC) (No. 1025) for the NAC International NAC-MPC, Multi-Purpose Cask.
 - NAC Calculation 12414-2007, Rev. 1
3. NAC is the owner of this information that is considered to be NAC Proprietary Information.
4. NAC makes this application for withholding of proprietary information based 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 Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial financial information obtained from a person, and privileged or confidential" (Exemption 4). The information for which exemption from disclosure is herein sought is all "confidential commercial information," and some portions may also qualify under the narrower definition of "trade secret," within the meanings assigned to those terms for purposes of FOIA Exemption 4.
4. 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 competitors of NAC, without license from NAC, constitutes a competitive economic advantage over 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.
 - c. Information that reveals cost or price information, production capacities, budget levels or commercial strategies of NAC, its customers, or its suppliers.
 - d. Information that reveals aspects of past, present or future NAC customer-funded development plans and programs of potential commercial value to NAC.
 - e. Information that discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information that is sought to be withheld is considered to be proprietary for the reasons set forth in Items 4.a, 4.b, and 4.d.

5. The information to be withheld is being transmitted to the NRC in confidence.
6. The information sought to be withheld, including that compiled from many sources, is of a sort customarily held in confidence by NAC, and is, in fact, so held. This information has, to the best of

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my knowledge and belief, consistently been held in confidence by NAC. 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 proprietary information and the subsequent steps taken to prevent its unauthorized disclosure are as set forth in Items 7 and 8 following.

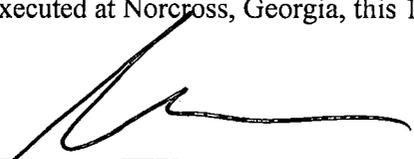
7. Initial approval of proprietary treatment of a document/information is made by the Vice President, Engineering, the Project Manager, the Licensing Specialist, or the Director, Licensing – the persons most likely to know the value and sensitivity of the information in relation to industry knowledge. Access to proprietary documents within NAC is limited via “controlled distribution” to individuals on a “need to know” basis. The procedure for external release of NAC proprietary documents typically requires the approval of the Project Manager based on a review of the documents for technical content, competitive effect and accuracy of the proprietary designation. Disclosures of proprietary documents outside of NAC are limited to regulatory agencies, customers and potential customers and their agents, suppliers, licensees and contractors with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
8. NAC has invested a significant amount of time and money in the research, development, engineering and analytical costs to develop the information that is sought to be withheld as proprietary. This information is considered to be proprietary because it contains detailed descriptions of analytical approaches, methodologies, technical data and/or evaluation results not available elsewhere. The precise value of the expertise required to develop the proprietary information is difficult to quantify, but it is clearly substantial.
9. Public disclosure of the information to be withheld is likely to cause substantial harm to the competitive position of NAC, as the owner of the information, and reduce or eliminate the availability of profit-making opportunities. The proprietary information is part of NAC’s comprehensive spent fuel storage and transport technology base, and its commercial value extends beyond the original development cost to include the development of the expertise to determine and apply the appropriate evaluation process. The value of this proprietary information and the competitive advantage that it provides to NAC would be lost if the information were disclosed to the public. Making such information available to other parties, including competitors, without their having to make similar investments of time, labor and money would provide competitors with an unfair advantage and deprive NAC of the opportunity to seek an adequate return on its large investment.

STATE OF GEORGIA, COUNTY OF GWINNETT

Mr. George Carver, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated herein are true and correct to the best of his knowledge, information and belief.

Executed at Norcross, Georgia, this 12th day of February 2018.



George Carver
Vice President, Engineering and Licensing
NAC International Inc.

Subscribed and sworn before me this 12th day of February, 2018.



Notary Public

