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March 12, 2018
E-50936

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

72-1004

Subject: NUH-003, Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS[®] Horizontal Modular Storage System For Irradiated Nuclear Fuel, Revision 17

Reference: NUH-003, Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel, Revision 16, July 27, 2017 (E-46684)

In order to formally incorporate Certificate of Compliance (CoC) holder commitments associated with U.S. NRC review and approval of the CoC 1004 Renewal Application and as required by a condition of the renewal (which was approved by the NRC and became effective on December 11, 2017), TN Americas LLC has updated the Reference and herewith submits the subject UFSAR Revision 17. In addition, pursuant to 10 CFR 72.248(c)(5), this update to the UFSAR incorporates changes to the Standardized NUHOMS[®] System implemented by TN Americas LLC under 10 CFR 72.48 from July 28, 2017 up to and including March 11, 2018.

I certify that this submittal accurately presents changes made from July 28, 2017 up to and including March 11, 2018.

The changed areas are marked as follows.

- New or changed pages show "Revision 17" and "March 2018" in their footer area.
- Changed areas are generally indicated using single revision bars in the right-hand margin. Newly inserted text is generally shown by italics.
- Pages that are only CoC 1004 renewal-related (except new Chapter 12) include a bold text statement in the footer indicating "Any changes on this page are a part of CoC 1004 renewal."
- Revision bars on Revision 17 pages with no annotation represent 10 CFR 72.48 changes.

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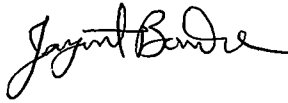
- Pages changed by both CoC 1004 renewal and 10 CFR 72.48 changes are annotated with "Renewal" adjacent to the applicable revision bars in the right-hand margin for the CoC 1004 renewal-related changes, and "72.48" adjacent to the applicable revision bar for 72.48.

UFSAR Revision 14 was the current UFSAR when the CoC 1004 renewal application was submitted on November 4, 2014 (ML14309A344). A review was performed of all changes made by TN Americas LLC pursuant to 10 CFR 72.48 in UFSAR Revision 15, Revision 16 and in the intervening timeframe to account for renewal aspects and no changes were required.

This submittal includes proprietary information which may not be used for any purpose other than NRC staff use of the UFSAR. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public disclosure. This submittal also includes security-related information. Accordingly, public versions of all replacement UFSAR pages and drawings are provided as Enclosure 3.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Dennis Williford at 704-805-2223 or me at 410-910-6881.

Sincerely,



Jayant Bondre
Chief Technical Officer

cc: Christian Jacobs (NRC SFM) as follows, in a separate mailing:

- One paper copy of Enclosure 1 and this transmittal letter
- Two electronic copies (computer disks) of the Standardized NUHOMS® UFSAR, Revision 17 (Proprietary Version)

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement Pages and Drawings for the Standardized NUHOMS® System UFSAR, Revision 17 (Proprietary Version)
3. Replacement Pages and Drawings for the Standardized NUHOMS® System UFSAR, Revision 17 (Public Version)

**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 Technology 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:

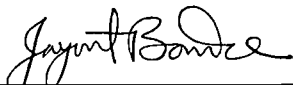
- Enclosure 2 - Portions of Replacement Pages and Drawings for the Standardized NUHOMS® System UFSAR, Revision 17 (Proprietary Version)

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. This document has been appropriately designated as proprietary.

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.

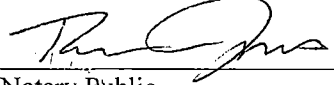
- 1) The information sought to be withheld from public disclosure involves portions of the updated final safety analysis report related to the design of the Standardized NUHOMS® dry spent fuel storage system, which is owned by and has been held in confidence by TN Americas LLC.
- 2) The information is 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 consists of descriptions of the design of dry spent fuel storage systems, the application of which provide 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 developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.



Jayant Bondre
Chief Technology Officer, TN Americas LLC

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



Notary Public

My Commission Expires 10/16/19