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May 14, 2018  
E-51162

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

Subject: TN-68 Updated Final Safety Analysis Report (UFSAR), Revision 9,  
and 10 CFR 72.48 Summary Report for the Period 05/13/16 to  
05/14/18, Docket 72-1027

Reference: Letter from Jayant Bondre to NRC Document Control Desk, "TN-68  
Updated Final Safety Analysis Report (UFSAR), Revision 8, and 10  
CFR 72.48 Summary Report for the Period 05/15/14 to 05/12/16,  
Docket 72-1027," May 12, 2016 (E-44744)

Pursuant to 10 CFR 72.248, TN Americas LLC has updated the TN-68 UFSAR, last updated by the submittal referenced above, and herewith submits the subject UFSAR Revision 9 changes for docketing. This update incorporates changes implemented by TN Americas LLC pursuant to 10 CFR 72.48 for the time period 05/13/16 to 05/14/18.

I certify that this submittal accurately presents changes made since the date of the submittal referenced above.

Enclosure 1 provides new and replacement UFSAR pages, including a List of Effective Pages (LOEP) that identifies the Revision 9 pages. The submittal contains proprietary information; therefore, an affidavit is provided as Enclosure 3, specifically requesting that proprietary information be withheld from public disclosure. The submittal also includes security-related information. Accordingly, a public version of all new and replacement pages and the drawing are provided as Enclosure 2.

The changed areas are marked as follows:

- New or changed pages show "Rev. 9" and "5/18" in the footer.
- Changed areas are indicated using single revision bars in the right-hand margin. Newly inserted text is shown by italics.
- Drawing changes are indicated using clouds.

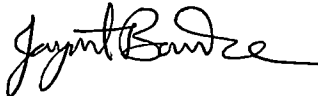
Also, in regard to the summary report required to be submitted pursuant to 10 CFR 72.48(d)(2), TN Americas LLC made no changes in facilities or spent fuel storage

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case design, no changes in procedures, and there were no tests or experiments pursuant to paragraph (c)(2) of 10 CFR 72.48 during the period 05/13/16 to 05/14/18 for the TN-68.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Glenn Mathues at 410-910-6538, or Mr. Dennis Williford at 704-805-2223.

Sincerely,



Jayant Bondre

Chief Technical Officer

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

- One paper copy of this cover letter
- Two electronic copies (computer disk) of the TN-68 UFSAR, Revision 9 (Proprietary Version)

List of Enclosures:

1. New and Replacement Pages and Drawings for the TN-68 UFSAR, Revision 9 (Proprietary Version)
2. New and Replacement Pages and Drawings for the TN-68 UFSAR, Revision 9 (Public Version)
3. Affidavit Pursuant to 10 CFR 2.390

Proprietary Information on This Page  
Withheld Pursuant to 10 CFR 2.390

**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 is contained in Enclosure 1, as listed below:

- Enclosure 1 - Page 6A.3-1 from the TN-68 updated final safety analysis report (UFSAR)

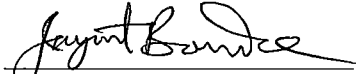
This page has been appropriately designated as proprietary.

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.

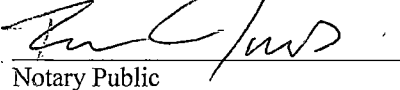
- 1) The information sought to be withheld from public disclosure involves page 6A.3-1 from the TN-68 UFSAR related to the design of the TN-68 System, which is owned and has been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN Americas LLC, 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 and analysis 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 14<sup>th</sup> day of May, 2018.

  
Notary Public

My Commission Expires 10/16/19

**RONDA JONES**  
**NOTARY PUBLIC STATE OF MARYLAND**  
My Commission Expires October 16, 2018