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June 26, 2018
E-51949

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

Subject: Application for Amendment No. 4 to Certificate of Compliance No. 1029 – Partially Redacted UFSAR Tables (Docket 72-1029, EPID No. L-2017-LLA-0390)

Reference: Letter E-49353 from Jayant Bondre (TN Americas LLC) to U.S. NRC Document Control Desk, "Application for Amendment 4 to Standardized Advanced NUHOMS® Certificate of Compliance No. 1029 for Spent Fuel Storage Casks, Revision 0," dated November 15, 2017 (Docket No. 72-1029)

Based on discussions with the NRC staff, this submittal provides proprietary and public versions of two updated final safety analysis report (UFSAR) tables associated with proposed Amendment No. 4 to Certificate of Compliance No. 1029, which had previously been marked as fully proprietary in the reference submittal. Changes were made solely to the proprietary designations in these tables.

Enclosure 2 herein provides a proprietary version of the two UFSAR tables and Enclosure 3 provides a public version.

Certain portions of this submittal include proprietary information, which may not be used for any purpose other than to support the NRC staff's review of the application. In accordance with 10 CFR 2.390, TN Americas LLC is providing an affidavit (Enclosure 1) specifically requesting that this proprietary information be withheld from public disclosure.

Should NRC staff have any questions or require additional information to support the review of this application, please contact Mr. Dennis Williford by telephone at (704) 805-2223, or by email at Dennis.Williford@orano.group.

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Sincerely,



Jayant Bondre
Chief Technical Officer

cc: Chris Allen (NRC SFM) as follows, all provided in a separate mailing:

- Six paper copies of this cover letter and Enclosures 1 and 2

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. CoC 1029 Amendment 4 Application, Revision 3 UFSAR Tables (Proprietary)
3. CoC 1029 Amendment 4 Application, Revision 3 UFSAR Tables (Public)

**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 is contained in Enclosure 2, as listed below:

- Enclosure 2 – UFSAR Tables A.4.11.2-4 and A.4.11.2-5

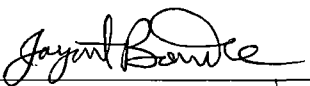
This document has been appropriately designated as proprietary.

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.

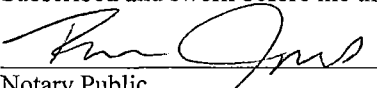
- 1) The information sought to be withheld from public disclosure involves certain design details in UFSAR tables for the Standardized Advanced NUHOMS® System, which are owned and have been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN Americas 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 consists of analytical results related to 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 Technical Officer, TN Americas LLC

Subscribed and sworn before me this 26th day of June, 2018.



Notary Public

My Commission Expires 10/16/19

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

Enclosure 3 to E-51949

**CoC 1029 Amendment 4 Application,
Revision 3 UFSAR Tables (Public)**

Table A.4.11.2-4
Maximum Component Temperatures for Off-Normal Condition

Component	Off-Normal Temperatures (LC#1)	
	Maximum Temp (°F)	Maximum Temperatures from Table A.4.4-3 (°F)
DSC Shell		469 ⁽¹⁾
DSC Support Rail		291
Inner Heat Shield		324
Upper Heat Shield		286
Upper Back Wall		232
Concrete		242

(1) Reported from Table A.4.1-2

Table A.4.11.2-5
Maximum Component Temperatures for Blocked Vent Accident Condition

Component	Maximum Temperatures (LC#2) at 12 hours (°F)	Maximum Temperatures (LC#2) at 25 hours (°F)	Maximum Temperatures Table A.4.1-3 at 25 hours (°F)
DSC Shell	[REDACTED]	[REDACTED]	642
DSC Support Rail			615 ⁽¹⁾
Inner Heat Shield			542 ⁽¹⁾
Upper Heat Shield			542 ⁽¹⁾
Upper Back Wall			--
Concrete			392 ⁽¹⁾
Thermocouple Temperature			--

(1) Maximum temperatures are reported after 40 hours of blocked vent accident condition.