



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 14, 2018

Mr. Dan Tallman, Manager
Rancho Seco Assets
Sacramento Municipal Utility District
Rancho Seco Nuclear Generating Station
14440 Twin Cities Road
Herald, CA 95638-9799

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION APPROVAL OF
SACRAMENTO MUNICIPAL UTILITY DISTRICT REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR
RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION
(CAC/EPID NOS. 001028/L-2018-RNW-0005; 000993/L-2018-LNE-0004)

Dear Mr. Tallman:

By letter dated March 19, 2018, Sacramento Municipal Utility District submitted an affidavit dated March 15, 2018, executed by Jayant Bondre, Chief Technology Officer, TN Americas LLC (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18101A022). You requested that the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- Enclosure 1 - Portions of various chapters and appendices of the Rancho Seco (RS) ISFSI License Renewal Application (LRA)
- Enclosure 3 - Non-Final Safety Analysis Report (FSAR) Drawings Associated with the RS ISFSI LRA

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- The information sought to be withheld from public disclosure involves operating experience with spent fuel storage system aging and details of spent fuel storage system aging management studies associated with the renewal of systems using the NUHOMS® technology, plus certain non-FSAR schematic drawings associated with these NUHOMS® based systems. The NUHOMS® technology and these drawings are owned and have been held in confidence by TN Americas LLC.
- 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.
- Public disclosure of the information is likely to cause substantial harm to the competitive position of TN Americas LLC because the information consists of operating experience with the aging degradation of systems using the NUHOMS® technology and details of spent fuel storage system aging management studies and planned aging management strategies associated with the renewal of a systems using the NUHOMS® technology, 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 America LLC's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statement, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, Enclosure 1, portions of various chapters and appendices of the RS ISFSI LRA, and Enclosure 3, Non-Final Safety Analysis Report (FSAR) Drawings Associated with the RS ISFSI LRA, both marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the U.S. Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified of the date of public disclosure, in advance which will be a reasonable time thereafter.

If you have any questions regarding this matter, please contact me at (301) 415-7213 or Wendy.Reed@nrc.gov.

Sincerely,

/RA/

Wendy A. Reed, Chemist
Renewals and Materials Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-11
License No. SNM-2510

CAC/EPID Nos. 001028/L-2018-RNW-0005
000993/L-2018-LNE-0004

cc: Rancho Seco Service List
Prakash Narayanan

cc

Arlen Orchard, Chief Executive Officer
Sacramento Municipal Utility District
6201 S Street
P.O. Box 15830
Sacramento, CA 95817 1899

Laura Lewis, Chief Legal Officer
Sacramento Municipal Utility District
6201 S Street
P.O. Box 15830
Sacramento, CA 95817 1899

Steve Lins, Deputy General Counsel,
Sacramento Municipal Utility District
6201 S Street
P.O. Box 15830
Sacramento, CA 95817 1899

Site Document Control Supervisor
Rancho Seco
14440 Twin Cities Road
Herald, CA 95638 9799

Commissioners' Office
California Energy Commission
1516 Ninth Street (MS 34)
Sacramento, CA 95814 5512

Radiation Program Director
California Radiologic Health Branch
P.O. Box 997414 (MS 7610)
Sacramento, CA 95899 7414

Sacramento County Board of Supervisors
700 H Street, Suite 2450
Sacramento, CA 95814

U.S. NUCLEAR REGULATORY COMMISSION APPROVAL OF SACRAMENTO MUNICIPAL UTILITY DISTRICT REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION (CAC/EPID NOS. 001028/L-2018-RNW-0005; 000993/L-2018-LNE-0004),
DOCUMEMNT DATE: September 14, 2018

DISTRIBUTION:
DSFM R/F

G:\SFST\Rancho Seco\License Renewal\Rancho Seco ISFSI renewal proprietary determination letter for 3-19-18 submittal.docx

ADAMS Accession No.: ML18261A022

| OFC | NMSS/DSFM | NMSS/DSFM | NMSS/DSFM |
|-------------|------------------|---------------------|------------------|
| NAME | WReed | WWheatley via email | MRahimi |
| DATE | 09/12/18 | 09/13/18 | 09/14/18 |

OFFICIAL RECORD COPY