



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 two letters, both dated August 6, 2018, Sacramento Municipal Utility District submitted two affidavits, both dated August 3, 2018, executed by Prakash Narayanan, Chief Technology Officer, TN Americas LLC (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18221A278 and ML18221A292). You requested that portions of various chapters and appendices of the Rancho Seco (RS) Independent Spent Fuel Storage Installation (ISFSI) license renewal application (LRA) be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390.

The affidavits 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 calculations associated with renewal of these NUHOMS® based systems. The NUHOMS® technology is owned and has 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 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, portions of various chapters and appendices of the RS ISFSI LRA, 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](mailto: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:

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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), DOCUMENT DATE: September 14, 2018

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**ADAMS Accession No.: ML18126A031**

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<b>NAME</b>	WReed	WWheatley via email	MRahimi
<b>DATE</b>	09/13/18	09/13/18	09/14/18

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