

TN INTERNATIONAL
STATEMENT OF PROPRIETARY INFORMATION
PURSUANT TO 49 CFR 7.14, 49 CFR 105.30, AND 10 CFR 2.390

I, Eric Delaunay, depose and say that I am the Vice President of Nuclear Logistic Operation of TN International, duly authorized to execute this statement of proprietary information and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. TN Americas LLC on behalf of TN International, is submitting this statement of proprietary information in conformance with the provisions of 49 CFR 7.14 and 49 CFR 105.30 of the U. S. Department of Transportation's (U.S. DOT) regulations, and with the provisions of 10 CFR 2.390 of the Nuclear Regulatory Commission's (NRC) regulations. This information is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. 552, as amended, for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosures 3 and 4, as listed below:

- Enclosure 3 – Listing of TN International SAR Changes, Chapter by Chapter
- Enclosure 4 - TN-MTR SAR Revision 15

These documents have been appropriately designated as proprietary.

Pursuant to the provisions of paragraph 7.14 of Part 7 and paragraph (a) (3) of Part 105 of the U.S.DOT regulations, and the provisions of paragraph (b) (4) of Section 2.390 of the NRC regulations the following is furnished for consideration by the U.S.DOT and by the NRC 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 involves a listing of changes to the Safety Analysis Report (SAR) for Model TN-MTR Packaging, plus the SAR itself, related to the design and analysis of the TN-MTR Packaging. This SAR is owned and has been held in confidence by TN International.
- 2) The information is of a type customarily held in confidence by TN International and not customarily disclosed to the public. TN International has a rational basis for determining the types of information that is customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of TN International because the information consists of descriptions of the design and analysis of the TN-MTR Packaging, as well as company business sensitive information, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with TN International, take marketing or other actions to improve their product's position or impair the position of TN International's product, and avoid developing similar data and analyses in support of their processes, methods, or apparatus.

Further the deponent sayeth not.

Eric Delaunay (Signature and date)
Vice President, Nuclear Logistic Operation
TN International

Witnessed by

Karine Jaffre (Signature and date)
Vice President, Legal, Logistics BU
TN International

September 13 2018

09/13/18


