AFFIDAVIT PURSUANT TO 10 CFR 2.390

TN Americas LLC)
State of Maryland)	SS.
County of Howard)

I, Paul Oleyar, depose and say that I am a Vice President 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 calculations and specifications planned to be submitted to the U.S. NRC in a submittal related to the Three Mile Island Unit 2 Independent Spent Fuel Storage Installation License Renewal Application, Docket 72-0020, as listed below:

- Test Specification Number 219-02-104, Revision 0, TMI-2 Canister Drying and Monitoring
- Calculation Number 219-02.0401, Revision 0, HSM and Cask Dose Rate Calculation
- Calculation Number 219-02.0403, Revision 0, Top End Dose Rates for TMI-2 Canisters
- Calculation Number 219-02.0300, Revision 1, Criticality Evaluation for the 10CFR72 INEL/TMI-2 Fuel ISS (NUHOMS[®]-12T)
- Calculation Number CALC-3021832, Revision 0, OS-197 Transfer Cask Shielding Analysis for TMI-2 ISFSI License Renewal

These documents have 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.

- The information sought to be withheld from public disclosure involves details of the methodology and inputs regarding criticality, shielding and dose rate evaluations, and test specifications related to the design of the NUHOMS[®] technology for storage of dry spent nuclear fuel, 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 details of the methodology and analyses related to the design of a dry spent fuel storage system, 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.

Paul Oleyar Vice President, TN Americas LLC

Subscribed and sworn before me this 14th day of November, 2018.

Jeslie Le Fors Notary Public

My Commission Expires 91291 2021

LESLIE LEFORS Notary Public-Maryland Frederick County My Commission Expires September 29, 2021