January 4, 2019
2018-030-SCL-01

Attn: Document Control Desk,
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: **Renewal request for Certificate of Compliance No.9365 and Revision of the Safety Analysis Report for the RT-100 Package**

Reference: RT-100, Certificate No. 9365 USA/9365/B(U)-96
Docket No. 71-9365

Document Control Desk, Dear Sir or Madam:

Pursuant to 10CFR71.38, Robatel Technologies, LLC hereby submits its Safety Analysis Report (SAR) Revision 7, to renew the Certificate of Compliance No. 9365 Revision 1 which was previously issued on July 27, 2015. We have attached a table summarizing the changes in SAR Revision 7. These changes incorporate adoption of the standard ANSI N14.5-2014. In addition, we have followed the guidance of NUREG-1886 to ensure this application thoroughly demonstrates the ability to meet both United States and Canadian regulations.

Some of the content of the Safety Analysis Report is Robatel's proprietary and trade secret information. The exact details and references are made in the attached affidavit related to this submittal.

Should you or members of your staff have any questions about this submittal, please contact me at dsanchette@robateltech.com or Jared Bower at jbower@robateltech.com.
Thank you for your attention to this submittal.

Respectfully,

Dominique Sanchette
Chief Operating Officer
dsanchette@robateltech.com

cc: Pierre Saverot

Attachments:

1) Affidavit of Robatel Technologies, concerning Confidential information and trade secrets
2) Summary of RT-100 SAR Revision 7 changes

Enclosure:

1) RT-100 Safety Analysis Report, Revision 7, Dated December 05, 2018.
2) Robatel Technologies, LLC, Quality Assurance Program for Packaging and Transportation of Radioactive Material, 10 CFR 71 Subpart H, Rev. 2, Dated November 10, 2017 and NRC Approved on March 21, 2012.

January 04, 2019

AFFIDAVIT OF ROBATEL TECHNOLOGIES, LLC
CONCERNING CONFIDENTIAL INFORMATION AND TRADE SECRETS
PURSUANT TO 10 CFR 2.390

Commonwealth of Virginia
County of Roanoke

I, Dominique Sanchette, depose and say that I am duly authorized to make this affidavit and have reviewed or caused to have reviewed the information which is identified below as proprietary, confidential and/or trade secret information that should be withheld from public disclosure according to 10 CFR 2.390(b). The documents listed in this Affidavit and corresponding data files are included with our submittal letter as part of our SAR Revision 7 submittal.

Enclosure 1: SAR, Revision 7, dated: December 5, 2018. Content as identified.

Safety Analysis Report Sections:

a) Table of Contents, List of Figures: 2.12.4-1 through 2.12.4-30
b) Attachments 1.4-1 to 1.4-8
c) Appendix 2.12: Impact Limiter Analysis
d) Appendix 2.14, Section 2.14.2.1: Hoop (Circumferential) Stresses
e) Table 3.2.1-1: Temperature-Independent Material Properties
   - Lines 9 to 17
f) Figure 3.3.1-1: RT-100 ANSYS Finite Element Model Volumes
g) Figure 3.3.1-2: RT-100 ANSYS Normal Condition Finite Element Mesh
h) Section 3.4.1.3: HAC Fire Analysis
i) Section 3.4.2.3: HAC Fire and Cool-down Analysis
j) Section 3.6: References
   - Reference 10, 11 and 12
k) Figure 4.1.2-1: Illustration of Containment Boundary
l) Section 5.3: Shielding Model
   - Introduction paragraph, line 9 to 13.
m) Section 5.3.1: Configuration of Source and Shielding
   - Figure 5.3.1-1: NCT Model 1
   - Figure 5.3.1-2: NCT Model 2, 10% Compaction
   - Figure 5.3.1-3: NCT Model Tally Surfaces for Dose Rate Response Estimation
n) Table 5.3.2-1: RT-100 Material Composition Summary
   - Lines 9 to 16
   - Table footer
o) Section 5.4.1: Methods
   - Figure 5.4.4-1: fluctuation in radial dose rates (Cs-137) – the RT-100 cross-section
p) Section 8.1.5.2: O-rings

q) Section 8.1.5.3: Ceramic Paper
r) Section 8.1.5.5: Carbon Steel and Alloy Steel Fasteners
s) Section 8.1.5.6: Stainless Steel Fasteners
t) Section 8.1.5.7: Thread Inserts
u) Appendix 8.3, Section 8.3.2: Minimum Lead Thickness and Gap Determination

I have personal knowledge of the criteria and procedures utilized by Robatel Technologies in designating information as a trade secret or as confidential information of a commercial or financial nature. These calculations contain unique information and methods that have been developed by Robatel Technologies, LLC for the design and engineering evaluation of transportation packages. These methods are considered confidential information that includes company trade secrets incorporated into such evaluation processes. The proprietary information submitted to the NRC contains the type of information Robatel Technologies regards as protected and of the type not to be disclosed to unauthorized persons.

The information designated here as proprietary is not available from public sources. Public disclosure of this information would cause substantial harm to the competitive position of Robatel Technologies, LLC. The company has made substantial resource and monetary investments to the development of the RT-100 Type B radioactive waste transport package. Competitors of Robatel Technologies, LLC would have great difficulty in duplicating the methods developed by Robatel Technologies, LLC, due not only to the financial investment of Robatel Technologies, but also to the unique skills, talents and expertise of Robatel Technologies, LLC employees and its trusted engineering resources who have developed these concepts and mathematical models. Disclosure of this information would cause Robatel Technologies, LLC irreparable financial harm and loss of business associated with this and other projects similar in nature.

Respectfully,

Dominique Sanchette, CEO
Robatel Technologies, LLC
Commonwealth of Virginia
County of Roanoke

On this 4th day of January 2019, be me, a Notary Public in and for the Commonwealth of Virginia, duly commissioned and sworn, personally appeared Dominique Sanchette, CEO for Robatel Technologies, LLC and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written

Notary Public, Commonwealth of Virginia, County of Roanoke

KALYN MICHELLE GREEN
Notary Public
Commonwealth of Virginia
Registration No. 7714279
My Commission Expires May 31, 2021