



June 21, 2019

Mr. Michael Layton, Director
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No.: Docket No. 71-9325 (HI-STAR 180 Model)
EPID No: L-2019-LLA-0122

Subject: Submittal of License Amendment Request 9325-3 and Request for Renewal of Certificate of Compliance 71-9325 for Model No. HI-STAR 180 Transport Package

Dear Mr. Layton,

In accordance with the provisions of 10 CFR 71.38(b) Holtec International hereby requests renewal of 10 CFR 71 Certificate of Compliance (CoC) Number 9325 for the Model No. HI-STAR 180 transportation package. The expiration date of this CoC is October 31, 2019.

Holtec International Report No. HI-2073681, Safety Analysis Report (SAR) on the HI-STAR 180 Package, Revision 6, is an updated, consolidated document, containing all information germane to the latest revision of the CoC; therefore, a consolidated application is not required for this renewal request pursuant to 10 CFR 71.38(c). However, a license amendment accompanied by Revision 7 of the same SAR is also requested in parallel as indicated herein.

Holtec International is pleased to submit License Amendment Request (LAR) 9325-3 proposing certain changes to the HI-STAR 180 Certificate of Compliance (CoC) Number 9325 Revision 2 and its corresponding supporting Safety Analysis Report (SAR) Revision 6. A complete and updated SAR (Revision 7) is provided with this LAR. The SAR's Revision Summary Log section includes information on the SAR's revision status and configuration control.

This LAR presents several proposed enhancements mainly to the allowable contents of the package. Design enhancement are limited and include enhancements to Holtite-B neutron shield material and Metamic-HT friction stir welds. The safety analysis has been enhanced commensurately. All significant enhancements are identified in the summary of proposed changes (SOPC) provided in Enclosure 1 to facilitate the staff's review. The SOPC includes reasons and justifications for various safety significant changes.

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Enclosure 2 contains Holtec's proposed changes to the Certificate of Compliance (CoC) for the staff's convenience.

Enclosures 3 and 4 contain the Safety Analysis Report (SAR) for the HI-STAR 180 Package (both proprietary and non-proprietary versions). Enclosure 5 contains the drawings that make up the licensing drawing package.

Enclosures 6 through 13 contain various supporting documents such as calculation packages and other technical reports. Supporting documents which were submitted under previous licensing action under Docket No. 71-9325 and that have not been revised are not included in this submittal.

Enclosure 14 is an affidavit prepared in accordance with 10 CFR 2.390 requesting that Enclosures marked proprietary be withheld from public disclosure due to their proprietary nature.

If you have any questions, then please contact me at 856-797-0900, ext. 3698.

Sincerely,

A handwritten signature in black ink, appearing to read "Luis Hinojosa", written in a cursive style.

Luis Hinojosa
Corporate Adjunct Licensing Manager
Project Manager of Licensing of Transportation Systems
Holtec International

cc: (letter only)
John McKirgan, USNRC
Pierre Saverot, USNRC

Enclosures:

- Enclosure 1: Summary of Proposed Changes (SOPC) for HI-STAR 180 LAR 9325-3 (Holtec Proprietary Information)
- Enclosure 2: Holtec Proposed CoC 71-9325 Revision 3 for the HI-STAR 180 Package (Holtec Non-Proprietary Information)



- Enclosure 3: HI-STAR 180 Safety Analysis Report (SAR), HI-2073681, Revision 7
(Holtec Proprietary Information)
- Enclosure 4: HI-STAR 180 Safety Analysis Report (SAR), HI-2073681, Revision 7
(Holtec Non-Proprietary Information)
- Enclosure 5: HI-STAR 180 Cask Licensing Drawing No. 4845, Rev. 13
HI-STAR 180 F-37 Basket Licensing Drawing No. 4847, Rev. 8
HI-STAR 180 F-32 Basket Licensing Drawing No. 4848, Rev. 8
HI-STAR 180 Impact Limiter Licensing Drawing No. 5062, Rev. 7
(Holtec Proprietary Information)
- Enclosure 6: Metamic-HT Qualification Sourcebook, HI-2084122, Revision 14
(Holtec Proprietary Information)
- Enclosure 7: HI-2167314, "Holtite-B Sourcebook", Revision 5
(Holtec Proprietary Information)
- Enclosure 8: Calculation Package for the HI-STAR 180 Transport Cask System (Structural),
HI-2063552, Revision 15 (Holtec Proprietary Information)
- Enclosure 9: Finite Element Analysis Supporting HI-STAR 180 SAR, HI-2063584, Revision 7
(Holtec Proprietary Information)
- Enclosure 10: Thermal Analysis of the HI-STAR 180, HI-2073649, Revision 10
(Holtec Proprietary Information)
- Enclosure 11: Shielding Analysis for the HI-STAR 180, HI-2073655, Revision 13
(Holtec Proprietary Information)
- Enclosure 12: Source Term Analysis for the HI-STAR 180, HI-2073653, Revision 4
(Holtec Proprietary Information)
- Enclosure 13: Criticality Analysis for the HI-STAR 180, HI-2073654, Revision 8
(Holtec Proprietary Information)
- Enclosure 14: Affidavit Pursuant to 10 CFR 2.390 to Withhold Information from Public
Disclosure

AFFIDAVIT PURSUANT TO 10 CFR 2.390

I, Kimberly Manzione, being duly sworn, depose and state as follows:

- (1) I have reviewed the information described in paragraph (2) which is sought to be withheld, and am authorized to apply for its withholding.
- (2) The information sought to be withheld is Enclosures 1, 3, and 5 through 13 to Holtec Letter 1553041-NRC, which contains Holtec Proprietary information.
- (3) In making this application for withholding of proprietary information of which it is the owner, Holtec International relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4) and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10CFR Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is here sought is all "confidential commercial information", and some portions also qualify under the narrower definition of "trade secret", within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).

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- (4) Some examples of categories of information which fit into the definition of proprietary information are:
- a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by Holtec's competitors without license from Holtec International constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
 - c. Information which reveals cost or price information, production, capacities, budget levels, or commercial strategies of Holtec International, its customers, or its suppliers;
 - d. Information which reveals aspects of past, present, or future Holtec International customer-funded development plans and programs of potential commercial value to Holtec International;
 - e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 4.a, 4.b and 4e above.

- (5) The information sought to be withheld is being submitted to the NRC in confidence. The information (including that compiled from many sources) is of a sort customarily held in confidence by Holtec International, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by Holtec International. No public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to

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regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.

- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within Holtec International is limited on a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his designee), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside Holtec International are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- (8) The information classified as proprietary was developed and compiled by Holtec International at a significant cost to Holtec International. This information is classified as proprietary because it contains detailed descriptions of analytical approaches and methodologies not available elsewhere. This information would provide other parties, including competitors, with information from Holtec International's technical database and the results of evaluations performed by Holtec International. A substantial effort has been expended by Holtec International to develop this information. Release of this information would improve a competitor's position because it would enable Holtec's competitor to copy our technology and offer it for sale in competition with our company, causing us financial injury.

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- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to Holtec International's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of Holtec International's comprehensive spent fuel storage technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology, and includes development of the expertise to determine and apply the appropriate evaluation process.

The research, development, engineering, and analytical costs comprise a substantial investment of time and money by Holtec International.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

Holtec International's competitive advantage will be lost if its competitors are able to use the results of the Holtec International experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to Holtec International would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive Holtec International of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

