

TRANSMITTAL FORM

Page 1 of 1

Date: December 3, 1993
File: NUH003.0003
No.: NUH-03-234

To: Mr. Frederick Sturz, Section Leader
Irradiated Fuel Section
Fuel Cycle Safety Branch
Division of Industrial and
Medical Nuclear Safety
United States Nuclear Regulatory Commission
Washington, DC 20555

NRC Docket No. 72-1004

Enclosures:

One uncontrolled copy of the following calculation package for your review:

"Standard NUHOMS® Prefabricated Module HSM and DSC Support Structure Analysis and Design Calc.," No. NUH004.0200, Rev. 6

One computer disk copy of computer runs for revision 6 of NUH004.0200 calc.:
HSM Thermal 93102915.18A, 93110213.13A, and 93110213.14A

One Affidavit Pursuant To 10CFR2.790

Please acknowledge receipt by signing below and returning original to:

PACIFIC NUCLEAR FUEL SERVICES

145 Martinvale Lane
San Jose, CA 95119
Phone: (408) 629-9800 Telecopy: (408) 281-6202

200003

ATTENTION: **Lynn Suckow**

Received: _____ Date: _____

cc: NUH004.0005

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Yellow: Recipient's Copy
Pink: File Copy

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AFFIDAVIT PURSUANT
TO 10 CFR 2.790

Pacific Nuclear Fuel Services Group)
State of California) SS.
County of Santa Clara)

I, Robert D. Quinn depose and say that I am a Manager of Product Engineering of Pacific Nuclear Fuel Services Group, duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

"Standard NUHOMS® Prefabricated Module - HSM and DSC Support Structure Analysis and Design," Calculation No. NUH004.0200, Revision 6, including attached computer disk labeled: "HSM Thermal, 93102915.18A, 93110213.13A, 93110213.14A - Disk 4 of 4."

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Pacific Nuclear Fuel Services Group 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 2.790 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.

1) The information sought to be withheld from public disclosure are design drawings and calculations of a concrete modular storage system, which is owned and has been held in confidence by Pacific Nuclear Fuel Services Group.

2) The information is of a type customarily held in confidence by Pacific Nuclear Fuel Services Group and not customarily disclosed to the public. Pacific Nuclear Fuel Services Group has a rational basis for determining the types of information customarily held in confidence by it.

3) The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.

4) The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.

5) Public disclosure of the information is likely to cause substantial harm to the competitive position of Pacific Nuclear Fuel Services Group because:

a) A similar product is manufactured and sold by competitors of Pacific Nuclear Fuel Services Group.

b) Development of this information by Pacific Nuclear Fuel Services Group required thousands of man-hours and hundreds of thousands of dollars. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.

c) In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development or design and analysis of a dry spent fuel storage system.

d) The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.

e) The information consists of description of the design and analysis of a dry spent fuel storage system, 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 Pacific Nuclear Fuel Services Group, take marketing or other actions to improve their product's position or impair the position of Pacific Nuclear Fuel Services Group's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

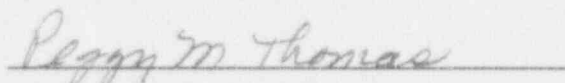
f) In pricing Pacific Nuclear Fuel Services Group's products and services, significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses must be included. The ability of Pacific Nuclear Fuel Services Group's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Further the deponent sayeth not.



Robert D. Quinn, P.E.
Manager, Product Engineering
Pacific Nuclear Fuel Services Group

Subscribed and sworn to before me this 3rd day of December, 1993.


Notary Public

