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October 29, 2020

E-57418

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Application for Certificate of Compliance No. 1042, Amendment No. 2, to NUHOMS® EOS System, Revision 6 (Docket No. 72-1042, CAC No. 001028, EPID: L-2019-LLA-0078) Revised Responses to Request for Additional Information

Reference: [1] Letter E-56684, dated June 30, 2020, from Prakash Narayanan (TN Americas LLC) Application for Certificate of Compliance No. 1042, Amendment No. 2, to NUHOMS® EOS System, (Docket No. 72-1042, CAC No. 001028, EPID: L-2019-LLA-0078) –Response to Request for Additional Information

[2] Letter from Christian Jacobs (NRC) to Prakash Narayanan (TN Americas LLC) TN Americas LLC Application for Certificate of Compliance No. 1042, Amendment No. 2, to NUHOMS® EOS System, Revision 2 (Docket No. 72-1042, CAC No. 001028, EPID: L-2019-LLA-0078) – Request for Additional Information, dated March 31, 2020

[3] Letter from Christian Jacobs (NRC) to Prakash Narayanan (TN Americas LLC), "Acceptance Review Completed for TN Americas LLC Application for Certificate of Compliance No. 1042, Amendment No. 2, to NUHOMS® EOS System (Docket No. 72-1042, CAC No. 001028, EPID: L-2019-LLA-0078), dated November 14, 2019

[4] Letter E-53778, dated April 18, 2019, from Paul Oleyar, Application for Amendment 2 to NUHOMS® EOS Certificate of Compliance No. 1042, Revision 0

This submittal is a supplement to Reference [1] above, and provides revised responses to specific Request for Additional Information (RAI) items forwarded by Reference [2] above. As a follow-up to the above Reference [1], the NRC and TN held a conference calls on September 15, 2020 for the purpose of discussing clarification to RAIs 4-7, 6-4, 6-5, 8-4, Non-RAI Item 1, Non-RAI Item 2, and Non-RAI Item 3. Additionally, a new item, Non-RAI Item 5, has been added as a result of an ACI code alternative request under Amendment 1 [ML20241A115].

Enclosure 2 of this submittal provides a revised response to each of the specific RAI items listed previously. Each revised RAI response has a section stating the impact of the response on the application, for both the Technical Specifications (TS) and the Updated Final Safety Analysis Report (UFSAR), indicating which sections, tables, figures, or drawings have been changed. Enclosure 12 provides a public version of Enclosure 2.

Enclosure 3 provides a listing of CoC 1042 Amendment 2 TS changes resulting from the revised RAI responses. Enclosure 4 provides a list of TS and UFSAR pages changed by this Amendment 2 Revision 6 submittal. Enclosure 5 provides a complete revision to the TS, denoted as Amendment 2 Application, Revision 6. Enclosure 6 provides the proprietary version of the UFSAR changed pages and drawings, with the public version of the UFSAR changed pages provided in Enclosure 7.

Enclosure 8 provides a listing of the computer files associated with the revised RAI response RAI 6-4. Enclosure 9 is a computer disk containing the computer files listed in Enclosure 9. Enclosure 10 provides a table listing the package accession numbers associated with the submittal packages for the Amendment 2 application. Enclosure 11 provides the revised changes and their associated justifications that are not associated with the RAI responses.

For the UFSAR, replacement and new Amendment 2, Revision 6 pages and drawings are provided. The pages are annotated as "72-1042 Amendment 2, Revision 6, October 2020" with changes indicated by italicized text and revision bars. The new changes associated with the RAI responses are further annotated with gray shading of the changed areas and an indication of which RAI is associated with the changes.

For the TS, Amendment 2 changes on Revision 6 pages are indicated by italicized text, revision bars, and gray shading to distinguish them from the changes proposed in Revisions 0, 1, 2, 3, and 5 of the Amendment 2 application (Revision 4 of the application was a hard drive only submittal).

Certain portions of this submittal include proprietary information, which may not be used for any purpose other than to support the NRC staff's review of the application. In accordance with 10 CFR 2.390, TN Americas LLC is providing an affidavit (Enclosure 1), specifically requesting that this proprietary information be withheld from public disclosure. The submittal also includes security-related information.

This submittal is being provided as an electronic submission, using the optical storage media (OSM) provision from Section 4 of the NRC Guidance for Electronic Submissions to the NRC.

Accordingly, we have included a Document Components listing and OSM #1, OSM #2, and OSM #3 listings at the end of this cover letter.

TN Americas LLC is prepared to meet with the staff to resolve any questions the staff might have. Should the NRC staff require additional information to support review of this application, please do not hesitate to contact Mr. Glenn Mathues at 410-910-6538, or by email at Glenn.Mathues@orano.group.

Sincerely,



Prakash Narayanan
Chief Technical Officer

cc: Chris Jacobs (NRC DFM):

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Responses to Request for Additional Information (Proprietary Version)
3. List of New CoC 1042 Amendment 2, Revision 6 Technical Specifications Changes and Justifications
4. List of Changed TS and UFSAR Pages Involved in CoC 1042 Amendment 2, Revision 6
5. CoC 1042 Proposed Amendment 2, Revision 6 Technical Specifications
6. CoC 1042 Amendment 2, Revision 6 UFSAR Changed Pages (Proprietary and Security-Related Version)
7. CoC 1042 Amendment 2, Revision 6 UFSAR Changed Pages (Public Version)
8. Listing of Computer Files Contained in Enclosure 9
9. Computer Files Associated with CoC 1042 Amendment 2, Revision 6 (Proprietary) (contained on one computer disk)
10. Listing of Package Accession Numbers Associated with the Amendment 2 Application Submittals
11. Additional Changes Not Associated with the RAIs
12. Responses to Request for Additional Information (Public Version)

Document Components:

001 Public Transmittal Letter.pdf, 316,717 bytes
002 Public Encl 1 Affidavit.pdf, 657,614 bytes
003 SUNSI Encl 2 RAIs and Responses.pdf, 1,956,095 bytes, Proprietary
004 Public Encl 3 TS changes and justifications.pdf, 92,548 bytes
005 Public Encl 4 List of Changed UFSAR Pages.pdf, 278,745 bytes
006 Public Encl 5 Technical Specifications.pdf, 2,537,204 bytes
007 SUNSI Encl 6 Proposed UFSAR Changed Pages.pdf, 4,512,860 bytes, Proprietary
008 Public Encl 7 Proposed UFSAR Changed Pages.pdf, 2,987,061 bytes
009 Public Encl 8 List of Files in Encl 9.pdf, 63,966 bytes
010 Public Encl 10 Amd 2 ML Numbers for Package App Submittals.pdf, 81,241 bytes
011 Public Encl 11 Non-RAI Changes.pdf, 145,638 bytes
012 Public Encl 12 RAIs and Responses.pdf, 907,560 bytes
013 SUNSI Encl 9 Computer Files Associated with Amd 2, Rev. 6 (computer disk), 192,413,696 bytes, Proprietary

OSM#1 (Entire submittal) (Disk):

001 Public Transmittal Letter.pdf, 316,717 bytes
002 Public Encl 1 Affidavit.pdf, 657,614 bytes
003 SUNSI Encl 2 RAIs and Responses.pdf, 1,956,095 bytes, Proprietary
004 Public Encl 3 TS changes and justifications.pdf, 92,548 bytes
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009 Public Encl 8 List of Files in Encl 9.pdf, 63,966 bytes
010 Public Encl 10 Amd 2 ML Numbers for Package App Submittals.pdf, 81,241 bytes
011 Public Encl 11 Non-RAI Changes.pdf, 145,638 bytes
012 Public Encl 12 RAIs and Responses.pdf, 907,560 bytes

OSM#2 (Enclosure 9 Disk):

013 SUNSI Encl 9 Computer Files Associated with Amd 2, Rev. 6 (computer disk), 192,413,696 bytes, Proprietary

OSM#3 (Public Information Only) (Disk):

001 Public Transmittal Letter.pdf, 316,717 bytes
002 Public Encl 1 Affidavit.pdf, 657,614 bytes
004 Public Encl 3 TS changes and justifications.pdf, 92,548 bytes
005 Public Encl 4 List of Changed UFSAR Pages.pdf, 278,745 bytes
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