



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 23, 2020

Mr. Wren Fowler  
Director, Licensing, Engineering  
NAC International  
3930 East Jones Bridge Road, Suite 200  
Peachtree Corners, GA 30092

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION APPROVAL OF NAC INTERNATIONAL'S REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR CERTIFICATE OF COMPLIANCE NO. 1015 RENEWAL (CAC NO. 001028)

Dear Mr. Fowler:

By letter dated October 13, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20293A102), NAC International (NAC) submitted an affidavit of the same date, executed by Rachel K Little, Notary Public of Cherokee County, Georgia. In it, Mr. George Carver requested that the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- Appendix B, Time-Limited Aging Analysis (TLAA) - Proprietary
  - Fatigue Evaluation of MPC and UMS Storage System Components for Extended Storage, 30013-2001, Revision 0
  - Corrosion Analysis of UMS VCC Steel Components for Extended Storage, 30013-2002, Revision 2
  - Aging Analyses for MPC/UMS Neutron Absorber and Neutron Shield Components (Storage/Transfer), 30013-5001, Revision 0, Enclosure 4
- Appendix E, Maine Yankee NAC-UMS System Pre-Application Inspection Report 30013-R-01Revision 0 - Proprietary Version

NAC stated the information should be considered exempt from mandatory public disclosure for the following reasons:

- Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by competitors of NAC, without license from NAC, constitutes a competitive economic advantage over other companies.
- Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product.
- Information that reveals cost or price information, production capacities, budget levels or commercial strategies of NAC, its customers, or its suppliers.
- Information that reveals aspects of past, present or future NAC customer-funded development plans and programs of potential commercial value to NAC.
- Information that discloses patentable subject matter for which it may be desirable to obtain patent protection.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statement, have determined that the submitted information sought to be withheld generally contains proprietary commercial information and should be withheld from public disclosure. However, upon discussion we agreed it would be beneficial to provide a high-level summary of the findings and conclusions made in "Appendix E, Maine Yankee NAC-UMS System Pre-Application Inspection Report 30013-R-01Revision 0." This summary can be provided in a future update or a supplement to the certificate of compliance renewal application.

Therefore, the three reports in Enclosure B and the report in Appendix E, marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended, provided a summary of the findings and conclusions from Enclosure 6 are included in a future update or supplement to the renewal application. Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified of the date of public disclosure, in advance which will be a reasonable time thereafter.

If you have any questions regarding this matter, please contact me at (301) 415-6293 or at [Christopher.Markley@nrc.gov](mailto:Christopher.Markley@nrc.gov).

Sincerely,



Christopher T. Markley, Systems  
Performance Analyst  
Storage and Transportation Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 72-1015  
CAC No. 001028  
EPID No. L-2020-RNW-0031

cc: Mr. George Carver

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**ADAMS Accession Number: ML20328A129** \*concurrence via email

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<b>DATE</b>	11/16/2020		11/18/2020		11/19/2020	

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