

December 3, 2020

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attention: Document Control Desk

Subject: Submission of NAC-LWT Safety Analysis Report (SAR), Revision 46
Incorporating the EFN Rods, Moly Targets, and Booster Rods as Approved
Contents for Transport.

Docket 71-9225

- References:
1. USNRC CoC No. 9225, Revision 69, Model No. NAC-LWT Package, Dated October 3, 2019
 2. USNRC CoC No. 9225, Revision 70, Model No. NAC-LWT Package, Dated September 30, 2020
 3. ED20190068, Submission of NAC-LWT Safety Analysis Report (SAR), Revision 45 Incorporating the Revised Definitions of Damaged and Undamaged NRU/NRX Fuel Approved Applications, July 16, 2019

NAC hereby submits NAC-LWT SAR Revision 46 via Enclosure 1. This SAR revision incorporates those changes approved via Certificate of Compliance (CoC) No. 9225 Revisions, 69, and 70 (References 1 and 2, respectively). Since the approval of Reference 3, NAC requested to revise the Safety Analysis Report (SAR) via submittals 20A, and 20B. These submittals included definitions of EFN Rods, Moly Targets, and Booster Rods as approved contents of the NAC-LWT. All submittals in support of the approval for References 2 have been consolidated and incorporated into Revision 45 of the NAC-LWT SAR to create Revision 46. As a consolidated SAR, all pages of the document are identified as Revision 46 with revision bars identifying all changes from Revision 45. A List of Effective Pages is provided for completeness. In addition, Enclosures 1 and 2 hereto detail the list of SAR and drawing changes, respectively.

This SAR revision contains NAC proprietary information and Attachment 1 is a signed affidavit, executed by Mr. George Carver, Vice President, Engineering and Licensing, requesting this proprietary information be withheld from public disclosure via 10 CFR 2.390. As part of this submittal, NAC is including one hard copy of both the proprietary and non-proprietary versions of SAR Revision 46.

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If you have any questions regarding this letter, please feel free to contact me on my direct number at 678-328-1236.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wren Fowler', written over a horizontal line.

Wren Fowler
Director, Licensing
Engineering

Attachment
Attachment 1 - NAC International Inc. Affidavit Pursuant to 10 CFR 2.390

Enclosures
Enclosure 1 – List of Changes, NAC-LWT SAR, Revision 46
Enclosure 2 – List of Drawing Changes, NAC-LWT SAR, Revision 46
Enclosure 3 – NAC-LWT SAR, Revision 46, Proprietary Version

Attachment 1

**NAC International Inc.
Affidavit Pursuant to 10 CFR 2.390**

NAC INTERNATIONAL INC.
AFFIDAVIT PURSUANT TO 10 CFR 2.390

George Carver (Affiant), Vice President, Engineering and Licensing, of NAC International Inc., hereinafter referred to as NAC, at 3930 East Jones Bridge Road, Peachtree Corners, Georgia 30092, being duly sworn, deposes and says that:

1. Affiant has reviewed the information described in Item 2 and is personally familiar with the trade secrets and privileged information contained therein, and is authorized to request its withholding.
2. The information to be withheld includes the following NAC Proprietary Information that is being provided to support the review of NAC's Consolidated Safety Analysis Report for a Certificate of Compliance (CoC) (No. 9225) for the NAC LWT Transport Package.
 - NAC-LWT SAR Revision 46, Proprietary Version

NAC is the owner of this information that is considered to be NAC Proprietary Information.

3. NAC makes this application for withholding of proprietary information based 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 10 CFR Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial financial information obtained from a person, and privileged or confidential" (Exemption 4). The information for which exemption from disclosure is herein sought is all "confidential commercial information," and some portions may also qualify under the narrower definition of "trade secret," within the meanings assigned to those terms for purposes of FOIA Exemption 4.
4. Examples of categories of information that 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 competitors of NAC, without license from NAC, constitutes a competitive economic advantage over other companies.
 - b. 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.
 - c. Information that reveals cost or price information, production capacities, budget levels or commercial strategies of NAC, its customers, or its suppliers.
 - d. Information that reveals aspects of past, present or future NAC customer-funded development plans and programs of potential commercial value to NAC.
 - e. Information that discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information that is sought to be withheld is considered to be proprietary for the reasons set forth in Items 4.a, 4.b, and 4.d.

5. The information to be withheld is being transmitted to the NRC in confidence.

NAC INTERNATIONAL INC.
AFFIDAVIT PURSUANT TO 10 CFR 2.390

6. The information sought to be withheld, including that compiled from many sources, is of a sort customarily held in confidence by NAC, and is, in fact, so held. This information has, to the best of my knowledge and belief, consistently been held in confidence by NAC. 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 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 Items 7 and 8 following.
7. Initial approval of proprietary treatment of a document/information is made by the Vice President, Engineering, the Project Manager, the Licensing Specialist, or the Director, Licensing – the persons most likely to know the value and sensitivity of the information in relation to industry knowledge. Access to proprietary documents within NAC is limited via “controlled distribution” to individuals on a “need to know” basis. The procedure for external release of NAC proprietary documents typically requires the approval of the Project Manager based on a review of the documents for technical content, competitive effect and accuracy of the proprietary designation. Disclosures of proprietary documents outside of NAC are limited to regulatory agencies, customers and potential customers and their agents, suppliers, licensees and contractors with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
8. NAC has invested a significant amount of time and money in the research, development, engineering and analytical costs to develop the information that is sought to be withheld as proprietary. This information is considered to be proprietary because it contains detailed descriptions of analytical approaches, methodologies, technical data and/or evaluation results not available elsewhere. The precise value of the expertise required to develop the proprietary information is difficult to quantify, but it is clearly substantial.
9. Public disclosure of the information to be withheld is likely to cause substantial harm to the competitive position of NAC, as the owner of the information, and reduce or eliminate the availability of profit-making opportunities. The proprietary information is part of NAC’s comprehensive spent fuel storage and transport technology base, and its commercial value extends beyond the original development cost to include the development of the expertise to determine and apply the appropriate evaluation process. The value of this proprietary information and the competitive advantage that it provides to NAC would be lost if the information were disclosed to the public. Making such information available to other parties, including competitors, without their having to make similar investments of time, labor and money would provide competitors with an unfair advantage and deprive NAC of the opportunity to seek an adequate return on its large investment.

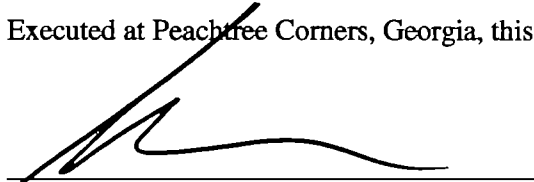
**NAC INTERNATIONAL INC.
AFFIDAVIT PURSUANT TO 10 CFR 2.390**

STATE OF GEORGIA, COUNTY OF GWINNETT

Mr. George Carver, being duly sworn, deposes and says:

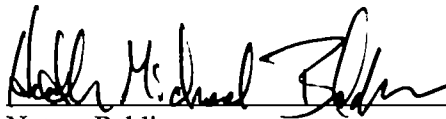
That he has read the foregoing affidavit and the matters stated herein are true and correct to the best of his knowledge, information and belief.

Executed at Peachtree Corners, Georgia, this 3rd day of December, 2020.



George Carver
Vice President, Engineering and Support Services
NAC International Inc.

Subscribed and sworn before me this 3rd day of December, 2020.



Notary Public

