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March 31, 2021  
E-58329

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

Subject: Application for Amendment 3 to NUHOMS<sup>®</sup> EOS Certificate of Compliance No. 1042, Revision 0 (Docket 72-1042)

In accordance with 10 CFR 72.244, TN Americas LLC herewith submits its application to amend Certificate of Compliance (CoC) No. 1042 for the NUHOMS<sup>®</sup> EOS System. The scope of Amendment 3 is described in Enclosure 2. Enclosure 3 includes a markup of proposed changes to the CoC document. Enclosure 4 provides a complete revision to the Technical Specifications (TS) with proposed changes indicated by gray shading, italicized text and revision bars. The proprietary version of the Updated Final Safety Analysis Report (UFSAR) changed pages and drawings associated with Amendment 3 are included as Enclosure 5 with the proposed changes indicated by gray shading, italicized text and revision bars, and a footer on each changed page annotated as "72-1042 Amendment 3, Revision 0, March 2021." The public version of these UFSAR changed pages is provided as Enclosure 6.

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.

Enclosure 7 provides a listing of the computer files associated with CoC 1042 Amendment 3. Enclosure 8 contains the computer files associated with this amendment submittal. Since Enclosure 8 contains entirely proprietary information, no public version is provided. Enclosure 9 provides a listing of the TS and UFSAR pages involved in Amendment 3, Revision 0.

Amendment 3 proposes a graded approach for certain changes. Consistent with the graded approach pilot processed as CoC 1004 Amendment 16, Enclosure 10

Enclosures transmitted herein contain SUNSI. When separated from enclosures, this transmittal document is decontrolled.

provides a graded approach evaluation discussion, including the graded approach evaluation criteria form. Since Enclosure 10 contains entirely proprietary information, no public version is provided.

Enclosure 11 provides a white paper that supports Change number 5, as described in Enclosure 2, a revision to the TS to utilize a single pass high amperage gas tungsten arc weld (HA-GTAW) on the outer top cover plate (OTCP) and to allow for ultrasonic testing (UT) on the outer top cover plate weld.

Based on recent experience with somewhat similar amendment scopes, essentially no physical changes to the design, and no major appendices being added to the UFSAR, TN is hopeful that NRC review of this application, with the issuance of a request for additional information, will result in Amendment 3 becoming effective on or near the end of third quarter 2022.

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 looks forward to working with the NRC staff on this amendment application. We are 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. Prakash Narayanan at 410-910-6859, or Mr. Glenn Mathues at 410-910-6538.

Sincerely,



Prakash Narayanan  
Chief Technical Officer

cc: Chris Jacobs (NRC SFM) as follows:

- One paper copy of this cover letter
- One computer disk containing this cover letter and Enclosures 1 through 7 and 9 through 11
- One hard drive with Enclosure 8

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Description, Justification, and Evaluation of Amendment 3 Changes

3. Proposed Certificate of Compliance No. 1042 Amendment 3, Revision 0 Markup
4. Proposed Technical Specifications, CoC 1042 Amendment 3, Revision 0
5. Proposed Amendment 3, Revision 0 Changes to the NUHOMS<sup>®</sup> EOS System Updated Final Safety Analysis Report (Proprietary and Security-Related Version)
6. Proposed Amendment 3, Revision 0 Changes to the NUHOMS<sup>®</sup> EOS System Updated Final Safety Analysis Report (Public Version)
7. Listing of Computer Files Contained in Enclosure 8
8. Certain Computer Files Associated with Certificate of Compliance 1042 Amendment 3 (Proprietary) (contained on one hard drive)
9. List of TS and UFSAR Pages Involved in CoC 1042 Amendment 3, Revision 0
10. Graded Approach Evaluation (Proprietary)
11. White Paper - High Amperage Gas Tungsten Arc Welding

**Document Components:**

001 Public Transmittal Letter.pdf, 978,559 bytes  
002 Public Encl 1 Affidavit.pdf, 853,277 bytes  
003 Public Encl 2 Description etc AMD 3.pdf, 132,228 bytes  
004 Public Encl 3 Proposed AMD 3 CoC Markup.pdf, 2,460,173 bytes  
005 Public Encl 4 Proposed AMD 3 Tech Specs.pdf, 2,754,200 bytes  
006 SUNSI Encl 5 Proposed AMD 3 UFSAR Changes.pdf, 26,048,805 bytes, Proprietary  
007 Public Encl 6 Proposed AMD 3 UFSAR Changes.pdf, 6,622,026 bytes  
008 Public Encl 7 List of files on Encl 8.pdf, 111,987 bytes  
009 SUNSI Encl 8 Computer Files Associated with AMD 3 (hard drive), 206,784,507,904 bytes, Proprietary  
010 Public Encl 9 List of TS and UFSAR Pages Involved in Amd 3 R0.pdf, 106,897 bytes  
011 SUNSI Encl 10 Graded Approach Evaluation.pdf, 127,414 bytes, Proprietary  
012 Public Encl 11 HA-GTAW White Paper.pdf, 418,375 bytes

**OSM#1 (Entire submittal except for the portable hard drive) (Disk):**

001 Public Transmittal Letter.pdf, 978,559 bytes  
002 Public Encl 1 Affidavit.pdf, 853,277 bytes  
003 Public Encl 2 Description etc AMD 3.pdf, 132,228 bytes  
004 Public Encl 3 Proposed AMD 3 CoC Markup.pdf, 2,460,173 bytes  
005 Public Encl 4 Proposed AMD 3 Tech Specs.pdf, 2,754,200 bytes  
006 SUNSI Encl 5 Proposed AMD 3 UFSAR Changes.pdf, 26,048,805 bytes, Proprietary  
007 Public Encl 6 Proposed AMD 3 UFSAR Changes.pdf, 6,622,026 bytes  
008 Public Encl 7 List of files on Encl 8.pdf, 111,987 bytes  
010 Public Encl 9 List of TS and UFSAR Pages Involved in Amd 3 R0.pdf, 106,897 bytes  
011 SUNSI Encl 10 Graded Approach Evaluation.pdf, 127,414 bytes, Proprietary  
012 Public Encl 11 HA-GTAW White Paper.pdf, 418,375 bytes

**OSM#2 (Enclosure 8 portable hard drive):**

009 SUNSI Encl 8 Computer Files Associated with AMD 3 (hard drive), 206,784,507,904 bytes, Proprietary

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

001 Public Transmittal Letter.pdf, 978,559 bytes  
002 Public Encl 1 Affidavit.pdf, 853,277 bytes  
003 Public Encl 2 Description etc AMD 3.pdf, 132,228 bytes  
004 Public Encl 3 Proposed AMD 3 CoC Markup.pdf, 2,460,173 bytes  
005 Public Encl 4 Proposed AMD 3 Tech Specs.pdf, 2,754,200 bytes  
007 Public Encl 6 Proposed AMD 3 UFSAR Changes.pdf, 6,622,026 bytes  
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