

**From:** [Yen-Ju Chen](#)  
**To:** [Denise Elisio](#)  
**Subject:** APPROVAL OF HOLTEC INTERNATIONAL REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE—CERTIFICATE OF COMPLIANCE NO. 1014, HI-STORM 100 CASK SYSTEM, AMENDMENT NO. 16  
**Date:** Wednesday, December 20, 2023 11:05:00 AM

---

Dear Denise:

By letters dated March 9, 2021, August 11, 2021, August 21, 2022, September 9, 2022, October 3, 2022, January 4, 2023, January 5, 2023, January 13, 2023, March 17, 2023, and September 20, 2023, Holtec International (Holtec) submitted affidavits requesting that certain information contained in these submittals for the HI-STORM 100 Cask System, Amendment No. 16 to be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, Section 2.390.

As applicable, a non-proprietary copy of the submittals is placed in the U.S. Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the Agencywide Documents Access and Management System Public Electronic Reading Room.

The affidavits state that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- The information discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by Holtec's competitors without license from Holtec International constitutes a competitive economic advantage over other companies.
- The information, if used by a competitor, would reduce the expenditure of resources or improve the competitive position of the competitor in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
- The information discloses patentable subject matter for which Holtec 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 statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure. The version of the submitted information 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.

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 refer to the following CAC and EPID information.

CAC No.: 001028

EPID No.: L-2021-LLA-0039

*Yen*

Yen-Ju Chen

Storage and Transportation Licensing Branch

Division of Fuel Management

U.S. Nuclear Regulatory Commission

[yen-ju.chen@nrc.gov](mailto:yen-ju.chen@nrc.gov)

301-415-1018