

March 6, 2025

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

Attn: Document Control Desk

Subject: Supplement to our Responses to the NRCs Request for Additional information for the Volunteer Transportation Package

Docket Number 71-9403
EPID L-2023-NEW-0007

- References:
1. ED20240053, Request for Nuclear Regulatory Commission's (NRC) Approval of the Volunteer Transportation Package, May 20, 2024
 2. NRC Correspondence, Request for Supplemental Information for the Review of the Model No. Volunteer Package, July 16, 2024
 3. ED20240119, Responses to the NRCs Request for Supplemental information for the Volunteer Transportation Package, August 22, 2024
 4. NRC Correspondence, Request for Additional Information for the Review of the Model No. Volunteer Package, February 12, 2025
 5. ED20250024, Responses to the NRCs Request for Additional information for the Volunteer Transportation Package, February 25, 2025
 6. ED20250029, Submission of Data Files to Support the Review of Our Responses to the NRC Request for Additional Information Certificate of Compliance No. 9403 for the NAC Volunteer Transportation Package, February 26, 2025

NAC International Inc. (NAC) hereby provides replacement pages and a revised calculation for our responses to the NRC Request for Additional Information (RAI) issued on February 25, 2025 (Reference 5). The overall package lengths for the different package configurations have been updated for the long, standard, and short package configurations to 266.5 inch, 254.5 inch, and 206.5 inch. This submittal package contains a replacement page for the proposed CoC (which reverts the text back to the previously submitted wording) and SAR, page 1.2-2 to correct the lengths. The changes to the proposed CoC can be found in Enclosure 1 and the changes to the SAR can be found in Enclosure 2. Additionally, a revision to calculation 70000.38-2105 and 70000.38-3010, were needed to correct an error on vendor supplied Technetics seal drawings which were provided as reference material in calculation Appendix F. The revised proprietary calculation supporting the approval of the package is included in Enclosure 3.

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The proprietary version of this submittal is marked as “NAC Proprietary Information.” An Affidavit pursuant to 10 CFR 2.390 is provided via Attachment 1 to this letter. In accordance with NAC’s administrative practices, upon final acceptance of this application, the 24A, 24B, 25A and this supplement changed pages will be reformatted and incorporated into the initial revision of the Volunteer Safety Analysis Report.

If you have any comments or questions, please contact me at 678-328-1252.

Sincerely,

Heath M. Baldner  Digitally signed by Heath M. Baldner
Date: 2025.03.06 15:52:40 -05'00'

Heath Baldner
Director, Licensing

Attachment
Attachment 1 – NAC International Affidavit Pursuant 10 CFR 2.390

Enclosures
Enclosure 1 – Proposed CoC Replacement Page, Volunteer Package SAR, Revision 25A, Supplement 1
Enclosure 2 – SAR Replacement Page, Volunteer Package SAR, Revision 25A, Supplement 1
Enclosure 3 – Supporting Calculations, Volunteer Package SAR, Revision 25A, Supplement 1

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

George Carver (Affiant), Vice President, Engineering and Support Services, of NAC International Inc., hereinafter referred to as NAC, at 2 Sun Court, Suite 220, 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 in this submittal.

Enclosure 2 – Supporting Calculations, Volunteer Package SAR, Revision 25A, Supplement 1

NAC is the owner of the information contained in the aforementioned pages/document, so they are considered 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.

**NAC INTERNATIONAL
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5. The information to be withheld is being transmitted to the NRC in confidence.
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 Engineer, 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.

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.



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NAC INTERNATIONAL
AFFIDAVIT PURSUANT TO 10 CFR 2.390 (continued)

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 6th day of March, 2025.

A blue ink signature of George Carver, consisting of a large, stylized 'G' followed by a horizontal line.

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

Subscribed and sworn before me this 6th day of March, 2025.

A black ink signature of the Notary Public, appearing to be 'Heath Baldner'.

Notary Public

