

From: [Norma Garcia Santos](#)
To: [Baldner, Heath M.](#)
Cc: [Yoira Diaz Sanabria](#); [Sandra Figueroa](#)
Subject: Approval of NAC International, Inc. Request For Withholding Information From Public Disclosure, CoC No. 9390, Rev. No. 5, Model No. OPTIMUS®-L
Date: Wednesday, April 30, 2025 4:06:00 PM

Dear Mr. Heath Baldner:

During the review of Revision No. 5 of the CoC No. 9390, Model No. OPTIMUS®-L, you submitted affidavits dated July 8, 2024 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML24191A044], July 16, 2024 (ML24204A17), September 10, 2024 (ML24255A813), November 14, 2024 (ML24319A234), November 18, 2024 (ML24327A142), February 6, 2025 (ML25037A292), February 19, 2025 (ML25050A045), and April 10, 2025 (ML25100A218) requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, Section 2.390:

1. Affidavit dated July 8, 2024 - **Enclosure 2**, *Supporting Calculations, NAC-OPTIMUS®-L SAR, Revision 24A*; **Enclosure 4**, *List of Drawing Changes, NAC-OPTIMUS®-L SAR, Revision 24A*; and **Enclosure 5**, *List of Effective Pages and SAR Changed Pages, NAC-OPTIMUS®-L SAR, Revision 24A*.
2. Affidavit dated July 16, 2024 – **Enclosure 1**, *Supporting Calculations, NAC-OPTIMUS®-L SAR, Revision 24A*; and **Data Files**: 70000.14-2110, Revision 0, *OPTIMUS-L Shielded Device Shipping Configuration Structural Evaluation*, 70000.14-5201, Revision 1, *OPTIMUS®-L Source Device Source Term and Heat Load Evaluation*, and 70000.14-5202, Revision 2, *OPTIMUS®-L Shielded Devices Dose Rate Evaluation*.
3. Affidavit dated September 10, 2024 – **Enclosure 2**, *List of Effective Pages and SAR Revision 2, NAC OPTIMUS®-L, Proprietary Version*.
4. Affidavit dated November 14, 2024 - **Enclosure 1**, *Shielded Devices RAI Responses, NAC-OPTIMUS®-L, Revision 24B*; **Enclosure 3**, *List of Calculations, NAC-OPTIMUS®-L, Revision 24B*; and **Enclosure 5**, *LOEP and SAR Page Changes, NAC-OPTIMUS®-L, Revision 24B*.
5. Affidavit dated November 18, 2024 - **Enclosure 1**, *MAGNASTOR® Proprietary Calculation, Data Disk 1 of 1: Document No. 70000.14-2110, Revision 1, and Document No. 70000.14-5202, Revision 3*.
6. Affidavit dated February 6, 2025 - **Enclosure 1**, *Shielded Devices Supplemental*

RAI Responses, NAC-OPTIMUS[®]-L SAR, Revision 25; Enclosure 3, List of Calculations (Document No. 70000.14-2110, Revision 2, and Document No. 70000.14-4102, Revision 1), *NAC-OPTIMUS[®]-L SAR, Revision 25; and Enclosure 5, LOEP and SAR Changed Pages, NAC-OPTIMUS[®]-L SAR, Revision 25A*

7. Affidavit dated February 19, 2025 – **Enclosure 1, SAR Changed Pages, NAC-OPTIMUS[®]-L SAR, Revision 25B.**

8. Affidavit dated April 10, 2025 - **Enclosure 2, OPTIMUS[®]-L SAR, Revision 3.**

Non-proprietary copies of these documents, as appropriate, were placed in the U.S. Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the ADAMS Public Electronic Reading Room.

In general, the affidavit notes that the information submitted should be considered exempt from mandatory public disclosure for the following reasons:

- The information discloses descriptions of the design and analysis of the Model No. OPTIMUS[®]-L, where prevention of its use by competitors of NAC International, Inc. (NAC), without license from NAC, constitutes a competitive economic advantage over other companies.
- The information, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacturing, shipment, installation, and assurance of quality or licensing of a similar product.
- The information includes certain portions of the safety analysis report related to the design of the Model No. OPTIMUS[®]-L transport package, which are owned and are held in confidence by NAC.

Therefore, the version(s) 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, you may contact me at 301-415-6999.

Docket No. 71-9390
EPID No. L-2024-LLA-0019

Sincerely,

Norma Garcia Santos

Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards
WAH: M, Th, and F
[Chat with me in Teams](#)