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July 8, 2025
E-64653

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

Subject: TN Americas LLC Updated Licensing Plans

Reference: Letter E-64124 from Prakash Narayanan (TN Americas LLC) to Document Control Desk, "TN Americas LLC Updated Licensing Plans," dated December 18, 2024

Consistent with the guidance in RIS 2005-27, TN Americas LLC (TN) herein submits to NRC updated licensing plans. Currently TN has the following licensing actions under NRC review:

- An application for Amendment 4 to NUHOMS® EOS System CoC 1042 was submitted to NRC for review and approval on September 29, 2022.
- An application for Amendment 19 to Standardized NUHOMS® System CoC 1004 was submitted to NRC for review and approval on November 5, 2024.
- An application for Amendment 5 to NUHOMS® EOS System CoC 1042 was submitted to NRC for review and approval on February 26, 2025.
- An application for a proposed ASME Code Alternative to Standardized NUHOMS® System CoC 1004 was submitted to NRC for review and approval on May 9, 2025.

The future licensing plans contained in Enclosure 1 are proprietary in nature and in accordance with 10 CFR 2.390(b), an affidavit is provided as Enclosure 2 specifically requesting that you withhold this information from public disclosure. Because Enclosure 1 is entirely proprietary, no public version of Enclosure 1 is provided.

We look forward to further discussion of our licensing plans with the NRC. Please contact Mr. Don Shaw at 410-910-6878 if you have any questions or require further clarification.

Sincerely,

A handwritten signature in blue ink that reads "A. Prakash" with a small "P.O." written below it.

Prakash Narayanan
Chief Technical Officer

cc: John-Chau Nguyen (NRC DFM)



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Enclosures:

1. TN Americas LLC Updated Licensing Plans (Proprietary)
2. Affidavit Pursuant to 10 CFR 2.390

Enclosure 1 to E-64653

TN Americas LLC Updated Licensing Plans
(Proprietary)

Withheld Pursuant to 10 CFR 2.390

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

TN Americas LLC)
State of Maryland) SS.
County of)

I, Prakash Narayanan, depose and say that I am Chief Technical Officer of TN Americas LLC, duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought meets the provisions of paragraph (a) (4) of Section 2.390 of the Commission's regulations. The information for which proprietary treatment is sought is contained in Enclosure 1 and is listed below:

- TN Americas LLC Updated Licensing Plans

I have personal knowledge of the criteria and procedures utilized by TN Americas LLC in designating information as a trade secret, privileged, or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced documents, should be withheld.

- 1) The information sought to be withheld from public disclosure is a list of identified future licensing action plans, which involve considerable research and development of intellectual property by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN Americas LLC and not customarily disclosed to the public. TN Americas LLC has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of TN Americas LLC because the information consists of near term and long-term licensing plan which involves research and development activities for dry spent fuel storage and transportation systems, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with TN Americas LLC, take marketing or other actions to improve their product's position or impair the position of TN Americas LLC's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

I declare that the statements set forth in this affidavit are true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 8th, 2025

A. Prakash

Prakash Narayanan
Chief Technical Officer, TN Americas LLC