

From: [Andrea Johnson](#)
To: [ext Stephanie Hanson](#)
Cc: [ext Jacob dolecki](#); [Michelle Hayes](#); [Victoria Huckabay](#); [Jason Lising](#); [Tony Nakanishi](#)
Subject: Holtec International - Submittal of the SMR-300 Concrete Strengthened Steel Structures Design and Analysis Methodology LTR Revision 1 Inadequate Marking of Information Requested to be Withheld from Public Disclosure and Other Issues
Date: Tuesday, September 22, 2026 4:50:47 PM

TO: Stephanie Hanson

SUBJECT: Holtec International - Submittal of the SMR-300 Concrete Strengthened Steel Structures Design and Analysis Methodology Licensing Topical Report, Revision 1 – Inadequate Marking of Information Requested to be Withheld from Public Disclosure and Other Issues

Dear Stephanie,

By letter dated September 14, 2026 (ADAMs Package ML26258A134), Holtec International submitted an affidavit requesting that certain information included with the letter be withheld from public disclosure pursuant to Title 10 of the Code of Federal Regulations (10 CFR) Section 2.390. The regulations in 10 CFR 2.390(b)(1) require the submitter to mark the information sought to be withheld in accordance with 10 CFR 2.390(b)(1)(i). Specifically, each document or page, as appropriate, containing information sought to be withheld from public disclosure must indicate, adjacent to the information, or as specified in paragraph (b)(1)(i)(A) of this section if the entire page is affected, the basis (i.e., trade secret, personal privacy, etc.) for proposing that the information be withheld from public disclosure under paragraph (a) of this section.

The NRC staff determined that the submittal did not clearly mark the specific portions of Enclosure 1 (ML26258A136) sought to be withheld. Specifically, the Appendix does not contain markings (e.g., brackets) to identify which portions should be withheld, but this information is redacted from the public version.

In accordance with 10 CFR 2.390(b)(1), the NRC staff will not review the request for withholding for this package unless and until the submitter corrects these deficiencies. The licensee should work with the staff at the NRC's Document Control Desk to replace the current documents with documents that are adequately marked. **When making this request please reference the original ML# in the Submission Comment Field to retain the same ML reference.** The NRC staff notes that documents not properly marked may be made available to the public.

Additionally, there are several formatting issues that should be resolved:

- Section numbering is out of order in several places (examples include but are not limited to Sections 11 and 13)

- Table of Contents does not match the page numbering (for example, Section 11.0 starts on page 92, but the table of contents indicates page 85)
- Table A-7 in Appendix A – it appears that there was a correction made but track changes were not accepted

Finally, the staff identified portions of material that were redacted in Rev. 0 but not redacted in Rev. 1 (see both Sections 13.16.0). Given some of the redaction issues we identified, this is a recommendation to review the redaction of those sections.

Sincerely,

Andrea Johnson
Team Lead
Allegations and Enforcement Branch
Office of the Chief Nuclear Reactor Inspector
U.S. Nuclear Regulatory Commission

EPID L-2025-TOP-0039
Docket Nos. 99902049