



October 11, 2004
NUH03-04-127

Mr. L. Raynard Wharton
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike M/S O13-D-13
Rockville, MD 20852

Subject: Submittal of Thermal Test Report of the NUHOMS Horizontal Storage Module, Model HSM-H (TN Report E-21625) and Revision 3 of Application for Amendment No. 8 to the NUHOMS® Certificate of Compliance (CoC), No. 1004 (TAC NO. L23653).

- References:
1. Revision 2 of Application for Amendment No. 8 to the NUHOMS® CoC No. 1004, Submitted September 17, 2004 (Docket 72-1004, TAC NO. L23653).
 2. Revision 0 of Application for the NUHOMS® HD Horizontal Modular Storage System, CoC No. 1030, Submitted May 5, 2004 (Docket 72-1030, TAC L23738).

Dear Mr. Wharton:

Transnuclear, Inc. (TN) herewith submits a report which documents subject thermal test performed to validate the methodology used to predict the thermal performance of the NUHOMS®-24PTH (Reference 1) and NUHOMS®HD systems (Reference 2).

The HSM-H thermal test results demonstrate that the thermal analysis methodology used in References 1 and 2 to predict the fuel cladding and the DSC component temperatures is very conservative. However, the test results also show that the methodology under predicts the HSM-H concrete and heat shield temperatures. Accordingly, an adjustment to the predicted HSM-H concrete and heat shield temperatures is made to match the test data. Enclosed herewith are changed pages of the SAR (Reference 1) which reflect this adjustment.

The subject test report is proprietary and in accordance with 10 CFR 2.390, Transnuclear, Inc. is providing an affidavit specifically requesting that you withhold this proprietary information from public disclosure.

Should you or your staff require additional information to support review of this application, please do not hesitate to contact me at 510-744-6053 or Mr. Jayant Bondre at 510-744-6043.

Sincerely,

U. B. Chopra
Licensing Manager

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Mr. L. Raynard Wharton
Spent Fuel Project Office, NMSS

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Dockets: 72-1004 and 72-1030

- Enclosures:
- 1 Affidavit for withholding proprietary information.
 2. Two copies of TN Report E-21625, Revision 0, "Thermal Test Report of the NUHOMS Horizontal Storage Module, Model HSM-H" (Proprietary).
 3. Ten Copies of Replacement Pages of Revision 3 of Amendment No. 8 to the NUHOMS Certificate of Compliance No. 1004.

cc Ms. Mary Jane Ross-Lee
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike M/S O-6-F-18
Rockville, MD 20852

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

Transnuclear, Inc.)
State of Washington) SS.
County of Pierce)

I, William D. Gallo, depose and say that I am Senior Vice President of Transnuclear, Inc., duly authorized to make 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 is contained in Enclosure 2 of this submittal and as listed below:

- Thermal Testing of the NUHOMS® Horizontal Storage Module, Model HSM-H, Report E-21625.

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. 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 document, should be withheld.

- 1) The information sought to be withheld from public disclosure are the specific design features of the HSM-H and the details of the testing performed to validate the thermal performance of the NUHOMS® system, which is owned and has been held in confidence by Transnuclear, Inc.
- 2) The information is of a type customarily held in confidence by Transnuclear, Inc. and not customarily disclosed to the public. Transnuclear, Inc. has a rational basis for determining the types of information customarily held in confidence by it.
- 3) The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.390 with the understanding that it is to be received in confidence by the Commission.
- 4) The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
- 5) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because:
 - a) A similar product is manufactured and sold by competitors of Transnuclear, Inc.