



October 3, 2007
E-25322

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

Subject: Updated Final Safety Analysis Report for the NUHOMS® HD System,
Revision 1, Docket No. 72-1030

References: 1. Final Safety Analysis Report for the NUHOMS® HD System, Revision 0,
February 23, 2007.

Gentlemen:

On February 23, 2007, Transnuclear, Inc. (TN) submitted Revision 0 of the NUHOMS® HD System Final Safety Analysis Report (Reference 1). 10 CFR 72.248(c)(6) requires updates to be filed every 24 months; however, TN herewith submits the first update at this time in order to provide information to facilitate NRC staff review of an application for Amendment 1 to the NUHOMS® HD System planned for submittal in the very near future.

This update incorporates changes to the NUHOMS® HD system implemented by TN under the 72.48 rule following the docketing of Reference 1, including 72.48 changes implemented through today, October 3, 2007. Changes are indicated by single revision bars in the right margin. Information that shifted from page to page due to changes is not considered changed and is not annotated with revision bars; therefore, certain pages indicate Revision 1 but have no revision bars.

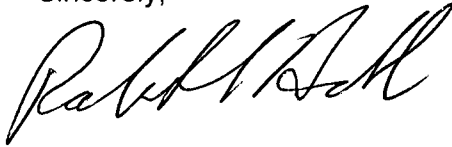
Replacement and new pages are included in Enclosures 2 and 3 for the Proprietary and Non-proprietary versions, respectively. In accordance with 10 CFR 72.248(c)(2) a list of effective pages is included for each version indicating each page contained in UFSAR Revision 1.

I certify that this information accurately represents changes made since the previous submittal dated February 23, 2007. TN will separately submit a summary description of all 72.48 changes and supporting evaluations implemented since submittal of Reference 1 as required per 72.48(d)(2).

This submittal includes proprietary and security-related information. In accordance with 10 CFR 2.390, I am providing an affidavit specifically requesting that you withhold this proprietary information from public disclosure.

Should the NRC staff require additional information regarding this submittal, please do not hesitate to contact Mr. Don Shaw at 410-910-6878 or me at 410-910-6930.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Grubb', written in a cursive style.

Robert Grubb
Senior Vice President - Engineering

cc: Mr. Joseph Sebrosky (NRC SFST) - one paper copy of this cover letter and the
Enclosure 1 affidavit, plus 2 paper copies of Enclosure 2

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement and New Pages for NUHOMS® HD UFSAR Revision 1 (Proprietary version).
3. Replacement and New Pages for NUHOMS® HD UFSAR, Revision 1 (Non-Proprietary version).

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

Transnuclear, Inc.)
State of Maryland) SS.
County of Howard)

I, Robert Grubb, 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 consists of certain portions of the Transnuclear, Inc. calculations listed below:

- UFSAR drawings
- Certain portions of UFSAR structural, thermal, shielding, and criticality chapters

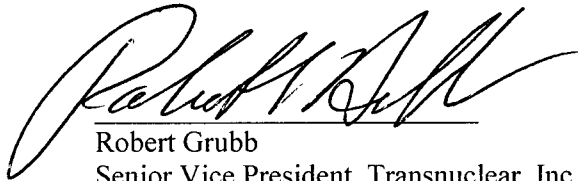
I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

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.

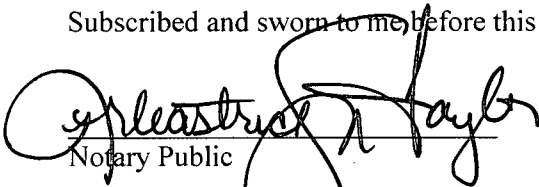
- 1) The information sought to be withheld from public disclosure involves UFSAR drawings and certain portions of the UFSAR chapters that discuss the structural, thermal, shielding, and criticality analyses for the NUHOMS® HD system, which are owned and have been held in confidence by Transnuclear, Inc.
- 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 will be shared with the Commission in confidence under the provisions of 10 CFR 2.390 with the understanding that it is to be reviewed 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.

- b) Development of this information by Transnuclear, Inc. required expenditure of considerable resources. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.
- c) In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of a design and analysis of a dry spent fuel storage system.
- d) The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
- e) The information consists of certain descriptions of the design and analysis of dry spent fuel storage 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 Transnuclear, Inc., take marketing or other actions to improve their product's position or impair the position of Transnuclear, Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- f) In pricing Transnuclear, Inc.'s products and services, significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses must be included. The ability of Transnuclear, Inc.'s competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Further the deponent sayeth not.


Robert Grubb
Senior Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 3rd day of October, 2007.


Notary Public

My Commission Expires 10 / 14 / 2008

