



October 2, 2009
E-28548

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 2, Docket No. 72-1030, Docket 72-1030

References: Letter from Robert Grubb (TN) to Document Control Desk (NRC), "Updated Final Safety Analysis Report for the NUHOMS® HD System, Revision 1, Docket No. 72-1030," October 3, 2007 (E-25322)

Pursuant to 10 CFR 72.248, Transnuclear, Inc., (TN) has updated the NUHOMS® HD System UFSAR, last updated by the letter referenced above, and herewith submits UFSAR Revision 2 updates for docketing. This update incorporates changes implemented by TN pursuant to 10 CFR 72.48, through the date of this letter. Changes are identified with revision bars and italicized text.

I certify that this submittal accurately presents changes made since the submittal of Reference 1.

This submittal includes proprietary information which may not be used for any purpose other than to support NRC staff review of the application. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public disclosure. This submittal also includes security-related information. Accordingly, versions of this information for public disclosure are provided in Enclosure 3. Please note that for completeness Enclosure 3 also provides a UFSAR cover page and list of effective pages for the non-proprietary UFSAR, but these pages do not contain proprietary information.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Don Shaw at 410-910-6878 or me at 410-910-6881.

Sincerely,

Jayant Bondre, PhD
Vice President - Engineering

cc: B. Jennifer Davis (NRC SFST) (2 copies of this letter and Enclosures 1 and 2, provided in a separate mailing)

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement Pages for the NUHOMS® HD System UFSAR, Revision 2
Proprietary Version
3. UFSAR Cover Page and List of Effective Pages for the Non-proprietary
UFSAR, and Public Versions of Changed NUHOMS® HD System
UFSAR Drawings

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

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

I, Jayant Bondre, depose and say that I am a Vice President of Transnuclear, Inc., 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 is contained in Enclosure 2 and as listed below:

1. Drawing 10494-72-3, Revision 3
2. Drawing 10494-72-100, Revision 3
3. Drawing 10494-72-2001-SAR, Revision 1
4. Drawing 10494-72-2003-SAR, Revision 1
5. Drawing 10494-72-2004-SAR, Revision 1
6. Drawing 10494-72-9001-SAR, Revision 1
7. Drawing 10494-72-9003-SAR, Revision 1

These documents have 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.

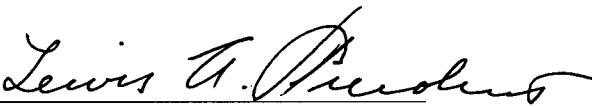
- 1) The information sought to be withheld from public disclosure involves safety analysis report drawings associated with the design of the NUHOMS® HD System, which are owned and have been held in confidence by Transnuclear, Inc.
- 2) The information is of a type customarily held in confidence by Transnuclear, 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 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.
- 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 drawings associated with 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.

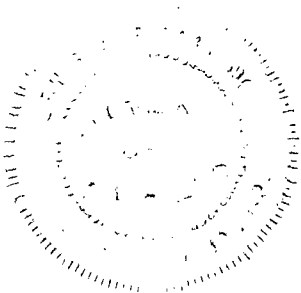
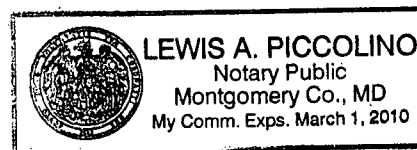
Further the deponent sayeth not.


Jayant Bondre
Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 2nd day of October, 2009.


Notary Public

My Commission Expires 03 / 01 / 2010



Non-Proprietary Version



NUHOMS[®] HD
Horizontal Modular Storage System
For Irradiated Nuclear Fuel

UPDATED FINAL SAFETY ANALYSIS REPORT

Revision 2

7135 MINSTREL WAY, COLUMBIA, MARYLAND 21045

Rev. 2, 10/09 |

LIST OF EFFECTIVE PAGES (Non-proprietary Version)

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Drawing No 10494-72-4 Sh1	2	not shown
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Drawing No 10494-72-5	2	not shown
Drawing No 10494-72-6	2	not shown
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Drawing No 10494-72-8	2	not shown
Drawing No 10494-72-9	2	not shown
Drawing No 10494-72-10	2	not shown
Drawing No 10494-72-11	2	not shown
Drawing No 10494-72-12	2	not shown
Drawing No 10494-72-15	2	not shown
Drawing No 10494-72-16	2	not shown
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3.9.8-24	0	1/07
3.9.8-25	0	1/07
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3.9.8-29	1	9/07
3.9.8-30	0	1/07
Table 3.9.8-1	0	1/07
Table 3.9.8-2	0	1/07
Table 3.9.8-3	0	1/07
Table 3.9.8-4	0	1/07
Table 3.9.8-5	0	1/07
Table 3.9.8-6	0	1/07
Table 3.9.8-7	0	1/07
Table 3.9.8-8	0	1/07
Table 3.9.8-9	0	1/07
Table 3.9.8-9 concluded	1	9/07
Table 3.9.8-10	0	1/07
Table 3.9.8-10 concluded	1	9/07
Figure 3.9.8-1	0	1/07
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Figure 3.9.8-3	0	1/07
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Table 3.9.9-1	0	1/07
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Table 3.9.9-6	0	1/07
Table 3.9.9-7	0	1/07
Table 3.9.9-8	0	1/07
Table 3.9.9-9	0	1/07
Table 3.9.9-10	0	1/07
Table 3.9.9-11	1	9/07
Table 3.9.9-12	0	1/07
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Figure 3.9.10-7	0	1/07
Figure 3.9.10-8	0	1/07
Figure 3.9.10-9	0	1/07
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Figure 3.9.10-13	0	1/07
Figure 3.9.10-14	0	1/07
Figure 3.9.10-15	0	1/07
Figure 3.9.10-16	0	1/07
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Figure 3.9.10-21	0	1/07
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<i>Revision 2 deletes Figures 3.9.11-5 through 3.9.11.10</i>		
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Figure 4-10 continued	1	9/07
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Table 6-1	0	1/07
Table 6-2	0	1/07
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Table 6-16 concluded	1	9/07
Table 6-17	0	1/07
Table 6-17 concluded	1	9/07
Table 6-18	0	1/07
Table 6-18 continued	0	1/07
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Table 6-27 continued	0	1/07
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Table 6-32	0	1/07
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Figure 6-1	0	1/07
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10494-72-2001-SAR sh2	1	Not shown
10494-72-2001-SAR sh3	1	Not shown
10494-72-2002-SAR sh1	0	Not shown
10494-72-2002-SAR sh2	0	Not shown
10494-72-2003-SAR sh1	1	Not shown
10494-72-2003-SAR sh2	1	Not shown
10494-72-2003-SAR sh3	1	Not shown
10494-72-2003-SAR sh4	1	Not shown
10494-72-2003-SAR sh5	1	Not shown
10494-72-2004-SAR sh1	1	Not shown
10494-72-2004-SAR sh2	1	Not shown
10494-72-2004-SAR sh3	1	Not shown
10494-72-2005-SAR sh1	0	Not shown
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10494-72-2005-SAR sh3	0	Not shown
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10494-72-2005-SAR sh5	0	Not shown
10494-72-9001-SAR sh1	1	Not shown
10494-72-9001-SAR sh2	1	Not shown
10494-72-9001-SAR sh3	1	Not shown
10494-72-9002-SAR sh1	0	Not shown
10494-72-9002-SAR sh2	0	Not shown
10494-72-9002-SAR sh3	0	Not shown
10494-72-9003-SAR sh1	1	Not shown
10494-72-9003-SAR sh2	1	Not shown
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<p>ALL DIMENSIONS APPLY AFTER WELDING AND FINAL MACHINING UNLESS OTHERWISE SPECIFIED.</p> <p>DIMENSIONS ARE IN INCHES AND DEGREES UNLESS OTHERWISE SPECIFIED. DIMENSIONING IN ACCORDANCE WITH ASME Y14.5M</p> <p>INTERPRETATION OF WELD SYMBOLS PER ANSI / AWS 2.4</p> <p>U.S. Patent No. 4,780,289 Transnuclear, Inc.</p> <p><small>This drawing may not be duplicated in whole or in part, or used for other than the intended purpose without written permission of Transnuclear, Inc.</small></p>	<p>A TRANSNUCLEAR AN AREVA COMPANY</p> <p>SAFETY ANALYSIS REPORT NUHOMS® 32PTH TRANSPORTABLE CANISTER FOR PWR FUEL SIPHON PIPE DETAILS</p> <p>DRAWING NO. 10494-72-3</p> <p>SCALE NONE</p> <p>SHEET 1 OF 1</p> <p>REVISION 3</p>
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<p>INTERPRETATION OF WELD SYMBOLS PER AWS / AWS 2.4</p>									
<p>U.S. Patent No. 4,780,289 Transnuclear, Inc.</p>	<p>SAFETY ANALYSIS REPORT NUHOMS® HD SYSTEM ISFSI HSM-H PARTS LIST NOTES</p>								
<p>This drawing may not be disclosed in whole or in part or used for other than the intended purpose without written permission of Transnuclear, Inc.</p>	<table border="1"> <tr> <td>DRAWING NO.</td> <td>SCALE</td> <td>SHEET</td> <td>REVISION</td> </tr> <tr> <td>10494-72-100</td> <td>NONE</td> <td>1 OF 1</td> <td>3</td> </tr> </table>	DRAWING NO.	SCALE	SHEET	REVISION	10494-72-100	NONE	1 OF 1	3
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