



20 July 2012  
EL&P-023-12

Mr. Pierre Saverot  
Licensing Branch  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Amendment Request for Certificate of Compliance No. 9168 for the  
Model 8-120B Package - Supplemental Information  
Docket No. 71-9168  
TAC No. L24549

Dear Mr. Saverot:

EnergySolutions provides the attached 8-120B Safety Analysis Report (SAR) revisions and drawings as supplemental information to our amendment request. The revisions and drawings address the thermal issues that have been the subject of several recent discussions.

The SAR revisions to incorporate the thermal shield are found in the description (Chapter 1), structural (Chapter 2), thermal (Chapter 3), and operations (Chapter 7). The thermal shield is now mentioned in Chapters 4 & 5, but its inclusion does not require any changes to the evaluation. The maintenance chapter (Chapter 8) is revised to incorporate changes made to NDE acceptance requirements committed to in the response to RAI #2. In addition, an addendum has been included that adds the thermal shield to the currently approved cask design. The addendum is expected to have a limited period of applicability, e.g., 9-12 months, to allow use of the cask with the thermal shield while new lids are fabricated and seals are qualified.

Since this package provides unique capabilities in support of both commercial and governmental nuclear facilities, we request completion of the review of this supplemental information as soon as possible with issue of the revised certificate by August 15, 2012.

Should you or members of your staff have questions about this supplemental information, please contact me at [mshittaker@energysolutions.com](mailto:mshittaker@energysolutions.com) or Mirza Baig at [mibaig@energysolutions.com](mailto:mibaig@energysolutions.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'mshittaker'.

Mark Whittaker  
Sr. Health Physicist, Radiological Services

Attachments:

- Revised SAR, Consolidated Rev. 3

Suite 100, Center Point II  
100 Center Point Circle  
Columbia, South Carolina 29210

NM5501

- Drawings
  - C-110-E-0007, Rev. 17 – 8-120B Shipping Cask (Non-Public)
  - DWG-CSK-12CV01-EG-0001 – 8-120B Cask Secondary Lid Thermal-Shield
  - C-110-E-0007, Rev. 13
- Public Reference Documents
  - ST-626 Rev 0
  - ST-627 Rev 1
  - ST-608 Rev 0
  - ST-637 Rev 0
  - ST-635 Rev 0
  - ST-679 Rev 0
  - TH-027 Rev 2
  - TH-028 Rev 2
  - ST-0001 Rev 0 and Data
  - TH-0001 Rev 0 and Data
  - TH-0002 Rev 3 and Data
- Non-Public Reference Documents
  - ST-551, Rev. 3
  - ST-625 Rev. 0
  - ST-596 Rev. 1
  - ST-618 Rev. 1
  - NU-391 Rev. 4 and Data
  - Proprietary Affidavit



I, James R. Carlson II, depose and say that I am duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified below as proprietary. The following documents and corresponding data files, which are included with our submittal letter EL&P-018-12, Response to RAI for the 8-120B Package contains proprietary information that should be withheld from public disclosure:

ST-551, Rev. 3  
ST-625 Rev. 0  
ST-596 Rev. 1  
ST-618 Rev. 1  
NU-391 Rev.4

I have personal knowledge of the criteria and procedures utilized by EnergySolutions in designating information as a trade secret or as confidential information of a commercial or financial nature. These calculations contain unique information and methods that have been developed by the EnergySolutions' staff for the evaluation of transportation packaging. These methods are considered confidential information that includes Company trade secrets incorporated into such evaluation processes. The proprietary information submitted to the Commission contains the type of information EnergySolutions regards as protected and of the type not to be disclosed to unauthorized persons.

The information designated here as proprietary is not available from public sources. Public disclosure of this information would cause substantial harm to the competitive position of EnergySolutions. The Company has made substantial investments in salaries and capital equipment and has committed to refine and improve EnergySolutions' radioactive waste management system. Competitors of EnergySolutions would have great difficulty in duplicating the methods developed by EnergySolutions, due not only to the financial investment of EnergySolutions, but also to the unique skills, talents, and expertise of EnergySolutions employees who have developed these concepts. Disclosure of this information could cause EnergySolutions to lose the financial opportunity and business associated with this and other projects similar in nature.

James R. Carlson II  
Global Commercial Group Application Engineering Manager (Technology,  
Engineering & Services)

On this 20<sup>th</sup> day of July 2012, before me, a Notary Public in and for the State of South Carolina, duly commissioned and sworn, personally appeared James Carlson, Engineering Manager for EnergySolutions, and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written.

*Cathleen Marie Ritz*  
Notary Public, State of South Carolina 7/20/12

Figure Withheld Under 10 CFR 2.390

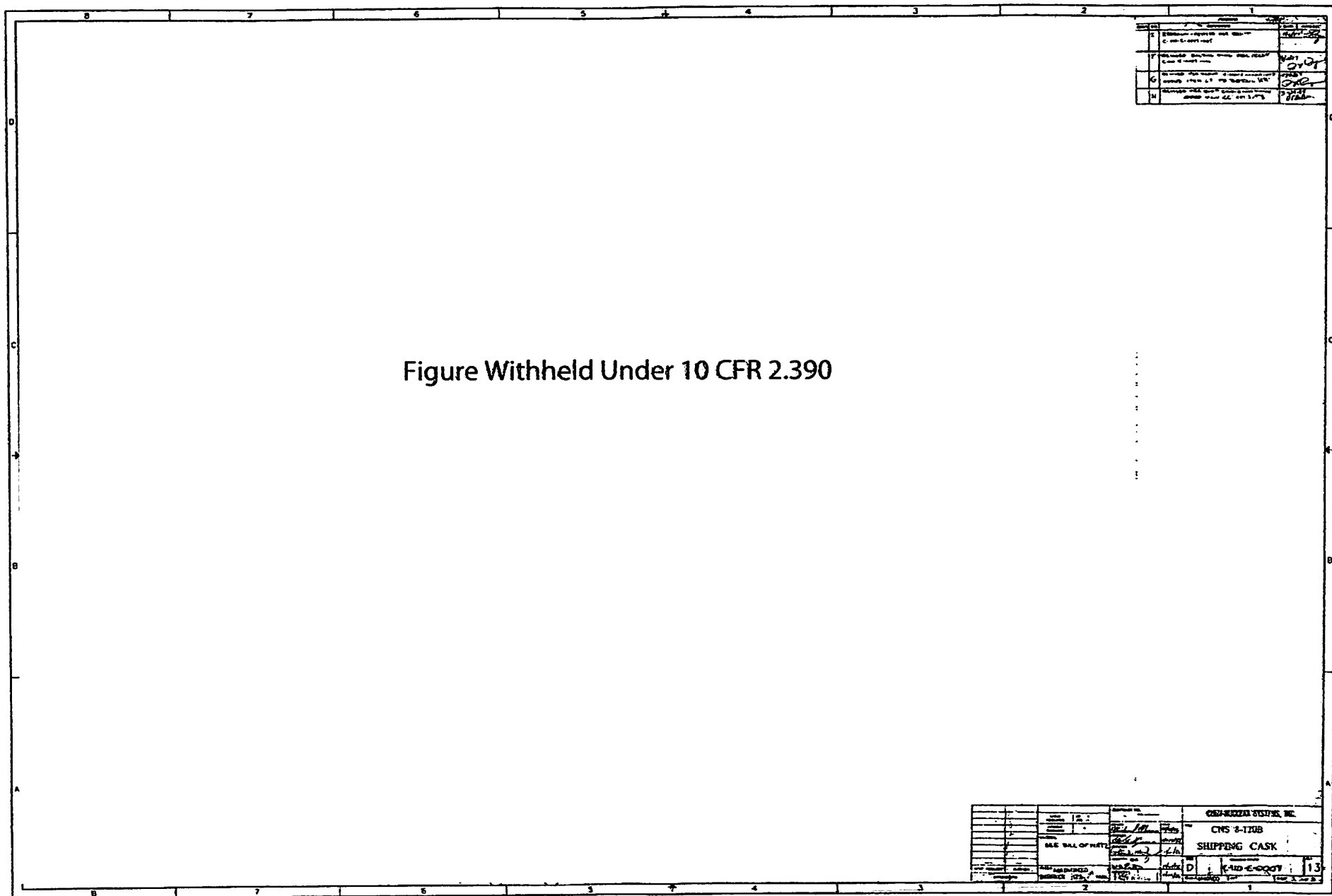


Figure Withheld Under 10 CFR 2.390

| REVISIONS |   | DATE    | BY                |
|-----------|---|---------|-------------------|
| 1         | Initial design and construction of the cask | 10/1/78 | W. J. [signature] |
| 2         | Revised design and construction of the cask | 10/1/78 | W. J. [signature] |
| 3         | Revised design and construction of the cask | 10/1/78 | W. J. [signature] |
| 4         | Revised design and construction of the cask | 10/1/78 | W. J. [signature] |

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| 12.2             |  | CNS-1708      |  |
| SEE WALL OF PITS |  | SHIPPING CASK |  |
| 12.2             |  | 13            |  |

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Figure Withheld Under 10 CFR 2.390

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| REVISIONS |                                     |
| 1         | Initial Design - Preliminary Design |
| 2         | Final Design - Preliminary Design   |
| 3         | Final Design - Preliminary Design   |
| 4         | Final Design - Preliminary Design   |
| 5         | Final Design - Preliminary Design   |
| 6         | Final Design - Preliminary Design   |
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| 10        | Final Design - Preliminary Design   |

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| REVISIONS |                                     |
| 1         | Initial Design - Preliminary Design |
| 2         | Final Design - Preliminary Design   |
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| 10        | Final Design - Preliminary Design   |