



May 21, 2015

**AFFIDAVIT OF ROBATEL TECHNOLOGIES, LLC
CONCERNING CONFIDENTIAL INFORMATION AND TRADE SECRETS
PURSUANT TO 10 CFR 2.390**

Commonwealth of Virginia
County of Roanoke

I, Christopher Dane, 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, confidential and/or trade secret information that should be withheld from public disclosure. The documents listed in this Affidavit and corresponding data files are included with our submittal letter 2014-020-SCL-01 as part of our SAR Revision 6 submittal.

Enclosure 1: SAR, Revision 6, dated: May 15, 2015. Content as identified.

1. Calculation Packages: (Incorporated into SAR Revision 6 by reference)

- a) 2014-020-CALC-LT-001, Rev.0
- b) CN-13039-203, Rev.0
- c) CN-13039-502, Rev.2

2. RAI Responses: (the responses to the following RAI questions are considered proprietary)

- a) RAI 2 – 1
- b) RAI 4 – 4
- c) RAI 4 – 6
- d) RAI 5 – 3

3. Safety Analysis Report Sections:

- a) Table of Contents, List of Figures: 2.12.4-1 through 2.12.4-30
- b) Attachments 1.4-1 to 1.4-8
- c) Appendix 2.12: Impact Limiter Analysis
- d) Appendix 2.14, Section 2.14.2.1: Hoop (Circumferential) Stresses
- e) Table 3.2.1-1: Temperature-Independent Material Properties
 - Lines 9 to 17
- f) Figure 3.3.1-1: RT-100 ANSYS Finite Element Model Volumes
- g) Figure 3.3.1-2: RT-100 ANSYS Normal Condition Finite Element Mesh
- h) Section 3.4.1.3: HAC Fire Analysis
- i) Section 3.4.2.3: HAC Fire and Cool-down Analysis
- j) Section 3.6: References
 - Reference 10, 11 and 12
- k) Figure 4.1.2-1: Illustration of Containment Boundary

- l) Section 5.3: Shielding Model
 - Introduction paragraph, line 9 to 13.
- m) Section 5.3.1: Configuration of Source and Shielding
 - Figure 5.3.1-1: NCT Model 1
 - Figure 5.3.1-2: NCT Model 2, 10% Compaction
 - Figure 5.3.1-3: NCT Model Tally Surfaces for Dose Rate Response Estimation
- n) Table 5.3.2-1: RT-100 Material Composition Summary
 - Lines 9 to 16
 - Table footer
- o) Section 5.4.1: Methods
 - Figure 5.4.4-3: Total Dose Rate Response for Co-60 (portion detailing the RT-100 cross-section)
 - Figure 5.4.4-4: Total Dose Rate Response for Cs-137 (portion detailing the RT-100 cross-section)
- p) Section 8.1.5.2: O-rings
- q) Section 8.1.5.3: Ceramic Paper
- r) Section 8.1.5.5: Carbon Steel and Alloy Steel Fasteners
- s) Section 8.1.5.6: Stainless Steel Fasteners
- t) Section 8.1.5.7: Thread Inserts
- u) Appendix 8.3, Section 8.3.2: Minimum Lead Thickness and Gap Determination

I have personal knowledge of the criteria and procedures utilized by Robatel Technologies 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 Robatel Technologies, LLC for the design and engineering evaluation of transportation packages. These methods are considered confidential information that includes company trade secrets incorporated into such evaluation processes. The proprietary information submitted to the NRC contains the type of information Robatel Technologies 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 Robatel Technologies, LLC. The company has made substantial resource and monetary investments to the development of the RT-100 Type B radioactive waste transport package. Competitors of Robatel Technologies, LLC would have great difficulty in duplicating the methods developed by Robatel Technologies, LLC, due not only to the financial investment of Robatel Technologies, but also to the unique skills, talents and expertise of Robatel Technologies, LLC employees and its trusted engineering resources who have developed these concepts and mathematical models. Disclosure of this information would cause Robatel Technologies, LLC irreparable financial harm and loss of business associated with this and other projects similar in nature.

Respectfully,

 *FOR C. Dane.*
 Christopher Dane, COO
 Robatel Technologies, LLC

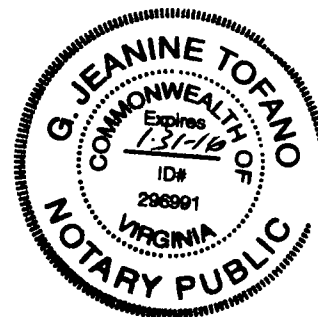
Commonwealth of Virginia
County of Roanoke

On this 21th day of May 2015, be me, a Notary Public in and for the Commonwealth of Virginia, duly commissioned and sworn, personally appeared ~~Christopher Dane, CEO~~ ^{Jane Martin, VP} for Robatel Technologies, LLC 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

G. Jeanine Toano

Notary Public, Commonwealth of Virginia, County of Roanoke





ROBATEL
technologies

05/19/2015

To Whomsoever It May Concern

I the undersigned, hereby authorize Donna Martin to act on my behalf in all manners relating to affidavit for Safety Analysis Report Revision 6, including signing of all documents relating to these matters. Any and all acts carried out by Donna Martin on my behalf, shall have the same effects as acts of my own.

This authorization is valid until further written notice from Christopher Dane, COO, Robatel Technologies, LLC.

Specimen Signature of Authority Holder
Donna Martin, Operations Manager, Robatel Technologies, LLC

Sincerely,

Christopher Dane, COO
Robatel Technologies, LLC