



E-42711  
July 30, 2015

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

Subject: Response to Request for Information - AREVA Inc. Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System (Docket 72-1042, TAC No. L25028)

Reference: Re-submittal of AREVA Inc. Application for Approval of the Spent Fuel Cask Design for the NUHOMS® EOS System, Docket 72-1042, dated June 16, 2015

Based on recent discussions with NRC staff, the purpose of this submittal is to provide EOS System proprietary SAR references 8-24 and 8-28, which are cited in the referenced re-submittal application. Note that reference 8-28 has previously been provided to the NRC staff, as Enclosure 2 to Transnuclear E-25506, November 7, 2007 (ML073180235).

EOS System SAR references 8-24 and 8-28 are provided as Enclosures 1 and 2, respectively. This submittal contains proprietary information, which may not be used for any purpose other than NRC staff review of the application. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 3) specifically requesting that you withhold this proprietary information from public disclosure. Both enclosures are proprietary in their entirety; therefore no public version of these enclosures is provided.

The following enclosures are included:

- Enclosure 1 provides EOS System SAR reference 8-24.
- Enclosure 2 provides EOS System SAR reference 8-28.
- Enclosure 3 provides the affidavit pursuant to 10 CFR 2.390.

Should you have any questions regarding this application, please contact Mr. Dennis Williford by telephone at (704) 805-2223, or by email at [Dennnis.Williford@areva.com](mailto:Dennnis.Williford@areva.com).

Sincerely,

A handwritten signature in black ink that reads 'Paul Triska'.

Paul Triska  
Vice President, Technical Services

**AREVA TN**

AREVA Inc.  
7135 Minutrel Way - Suite 300 - Columbia, MD 21046 USA  
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cc: John (Chau) N. Nguyen (NRC SFM) as follows, all provided in a separate mailing:

- Three computer disks with the cover letter and Enclosures 1, 2 and 3

Enclosures:

1. EOS System SAR reference 8-24
2. EOS System SAR reference 8-28
3. Affidavit pursuant to 10 CFR 2.390

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**Document Components:**

001 Public AREVA Inc. Transmittal Letter.pdf, 231,121 bytes  
002 SUNSI Enc 1 EOS System SAR reference 8-24.pdf, 7,299,168 bytes, Proprietary  
003 SUNSI Enc 2 EOS System SAR reference 8-28.pdf, 6,258,750 bytes, Proprietary  
004 Public Enc 3 Affidavit.pdf, 169,442 bytes

**OSM#1 (Entire Submittal) (DVD):**

001 Public AREVA Inc. Transmittal Letter.pdf, 231,121 bytes  
002 SUNSI Enc 1 EOS System SAR reference 8-24.pdf, 7,299,168 bytes, Proprietary  
003 SUNSI Enc 2 EOS System SAR reference 8-28.pdf, 6,258,750 bytes, Proprietary  
004 Public Enc 3 Affidavit.pdf, 169,442 bytes

**OSM#2 (Public Information Only) (DVD):**

001 Public AREVA Inc. Transmittal Letter.pdf, 231,121 bytes  
004 Public Enc 3 Affidavit.pdf, 169,442 bytes

**AREVA TN**

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**AFFIDAVIT PURSUANT**  
**TO 10 CFR 2.390**

AREVA Inc. )  
State of Maryland ) SS.  
County of Howard )

I, Paul Triska, depose and say that I am a Vice President of AREVA 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 Enclosures 1 and 2 and is listed below:

- Enclosure 1 EOS System SAR reference 8-24
- Enclosure 2 EOS System SAR reference 8-28


These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by AREVA 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 certain SAR references associated with the design of the NUHOMS® EOS System, which are owned and have been held in confidence by AREVA Inc.
- 2) The information is of a type customarily held in confidence by AREVA Inc. and not customarily disclosed to the public. AREVA Inc. has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of AREVA Inc. because the information consists of reports associated with the design and analysis of a dry spent fuel storage system, 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 AREVA Inc., take marketing or other actions to improve their product's position or impair the position of AREVA Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.

  
Paul Triska  
Vice President, AREVA Inc.

Subscribed and sworn to me before this 30th day of July, 2015.

Notary Public  
My Commission Expires 10/12/2015

