



E-35308
April 18, 2013

U.S. Department of Transportation
Attn: Mr. Richard W. Boyle, Chief
Pipeline & Hazardous Materials Safety Administration
Radioactive Materials Branch
1200 New Jersey Avenue, S.E.
East Building, PHH-20
Washington, DC 20590

Subject: Revalidation Application for German Certificate of Approval D/4365/AF-96
(Rev.1) for the ANF-50 Package - Competent Authority Certificate USA/0745/AF-96, Request for Thermal Input and Output Files Used in the SAR

Reference : Letter from Paul Triska (TN) to Richard Boyle (U.S. DOT); "Revalidation Application for German Certificate of Approval D/4365/AF-96 (Rev.1) for the ANF-50 Package - Request for Revision to Competent Authority Certificate USA/0745/AF-96," (TN Letter E-33729), dated November 13, 2012

Dear Mr. Boyle,

Based on recent discussions with U. S. DOT regarding the Competent Authority Certificate (CAC) Number USA/0745/AF-96, Transnuclear, Inc. (TN) herein submits thermal input and output files used in the ANF-50 Safety Analysis Report (SAR) submitted as part of the referenced letter above.

Enclosure 1 provides a listing of the files. Enclosure 2 provides the files on a DVD. Enclosure 3 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that you withhold proprietary information included in Enclosure 2 from public disclosure. That information may not be used for any purpose other than to support the review of the application. Because Enclosure 2 is entirely proprietary, no public version is provided.

If you have questions or require further information, please call Glenn Mathues at (410) 910-6538 or me at (410) 910-6933.

Very truly yours,

Glenn Guena
for Paul Triska
Vice President, Operations

TRANSNUCLEAR INC.

7135 Minstrel Way • Suite 300 • Columbia, MD 21045
Tel: 410-910-6900 • Fax: 410-910-6902
www.transnuclear.com

cc: Michael Conroy (U.S. Department of Transportation)

Enclosures:

1. List of Computational Files Contained in Enclosure 2
2. Computational Files on a DVD (Proprietary)
3. Affidavit Pursuant to 10 CFR 2.390

cc: Jessica Glenn
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
MAIL STOP E3D2M
Rockville, MD 28052

Sent 5/1/13 per DOT
Request

TRANSNUCLEAR INC.

7135 Minstrel Way • Suite 300 • Columbia, MD 21045
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Enclosure 1 to TN E-35308

List of Computational Files Contained in Enclosure 2

List of Computational Files Contained in Enclosure 2

Disk ID No. (size)	System Folder (size)	File Series (topics)	Number of files
Enclosure 2 DVD (1 of 1) ANF50 Thermal Input Output files (24.881MB)	Diagramme (681 KB)	anf50r_transmax.xls anf50r_transmin.xls	2
	max_Beladung (12.4 MB)	<u>If1</u> anf50r_if1.dat anf50r_if1.nas properties9.nas rad1.chb rad2c.chb rad4.chb rad6.chb rad7b.chb rad8d.chb rad11b.chb rad12bf.chb rad15bf.chb rad16bf.chb	13
		<u>If2</u> anf50r_if2.dat conv_p3.nas temp_if1.nas	3
	min_Beladung (11.8 MB)	<u>Inn1</u> anf50r_l1.nas anf50r_inn1.dat material10.nas properties8.nas rad1.chb rad2c.chb rad4.chb rad6.chb rad7b.chb rad8d.chb rad11b.chb rad12b.chb rad15b.chb rad16b.chb	14
		<u>Inn2</u> anf50def_inn2.dat conv_p3.nas temp_inn1.nas	3

Note: The nas files are Nastran 2001, MSC Software Corporation.

Enclosure 3 to TN E-35308

Affidavit Pursuant to 10 CFR 2.390

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

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

I, Glenn Guerra, 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 regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosure 2 and is listed below:

- Enclosure 2 –Computational Files on a DVD.

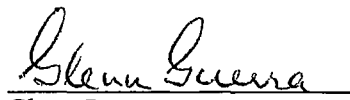
These documents have been appropriately designated as proprietary.

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.

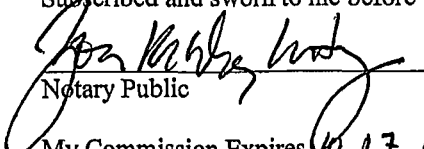
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the regulations, the following is furnished for consideration in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves the computational files associated with the thermal analysis, all related to the design of the ANF-50 package, which were obtained under a proprietary agreement with others, 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) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because the information is related to the design of transportation packaging, the application of which provides 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.

Further the deponent sayeth not.


Glenn Guerra
Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 18th day of April, 2013.


Notary Public

My Commission Expires 10/17/2015

