



October 13, 2016
E-45372

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

Subject: Application for Revision 9 to Certificate of Compliance No. 9301, Docket 71-9301, for the Model TNF-XI

References: [1] Certificate of Compliance No. 9301; Docket 71-9301, TNF-XI, Revision 8, dated March 7, 2014

[2] Safety Analysis Report (SAR), "TNF-XI Package," Revision 11

In accordance with the requirements of 10 CFR 71, Subpart D, AREVA Inc. herewith submits an application to revise the Certificate of Compliance (CoC) for the TNF-XI. This revision is for the addition of new content. There are no changes to the packaging design, acceptance tests, or maintenance programs, resulting from this addition. Changes to the proprietary markings in accordance with 10 CFR 2.390 were also incorporated. These had been previously marked in accordance with 10 CFR 2.790.

This submittal contains the following enclosures:

- Enclosure 1 provides a description of each safety analysis report (SAR) proposed chapter and/or section change, the reason for the change, and the associated justification.
- Enclosure 2 provides a consolidated copy of the TNF-XI SAR Revision 11A for the Revision Log, Chapter 1, Chapter 6, Appendix A.6, Appendix B.6, Chapter 7, and Chapter 8. This enclosure is proprietary.
- Enclosure 3 provides a consolidated copy of the TNF-XI SAR Revision 11A for the Revision Log, Chapter 1, Chapter 6, Appendix A.6, Appendix B.6, Chapter 7, and Chapter 8. This enclosure is non-proprietary.
- Enclosure 4 is a markup of Revision 8 of CoC No. 9301 for the proposed changes discussed in Enclosure 1.
- Enclosure 5 provides a listing of the computer files contained in Enclosure 6.
- Enclosure 6 is a separate computer disk containing the computer files.
- Enclosure 7 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that the proprietary information included in Enclosure 2 and Enclosure 6 of this submittal be withheld from public disclosure. That information may not be used for any purpose other than to support the review of the application for revision to the TNF-XI CoC. A non-proprietary version of Enclosure 2 is provided in Enclosure 3. Since Enclosure 6 is entirely proprietary, there is no corresponding non-proprietary version.

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The changed areas in the SAR are marked as follows:

- New or changed pages show "Revision 11A" in the header.
- Changed areas are indicated using revision bars in the right-hand margin. Newly inserted or changed text is shown by italics.

Based on communications with the NRC during the course of this licensing action, AREVA Inc. respectfully requests to be notified once the NRC has completed the safety review and determines that no additional information is required for issuance of the CoC, in order to submit a consolidated Revision 12 to the TNF-XI SAR (both the proprietary and the non-proprietary versions), which incorporates all the changes completed during the course of this application for revision.

AREVA Inc. respectfully requests that a review schedule be planned in order for Revision 9 to CoC 9301 TNF-XI Packaging to become effective on or before April 7, 2017 in order to support a future business need.

Should NRC staff have any questions or require additional information to support review of this application, please contact Mr. Glenn Mathues by telephone at 410-910-6538, or by e-mail at Glenn.Mathues@areva.com.

Sincerely,



Jayant Bondre
Chief Technical Officer

cc: Huda Akhavannik, U.S. Nuclear Regulatory Commission

- One electronic copy (computer disk) of this letter and Enclosures 1 through 5 and 7
- One electronic copy (computer disk) of the Computer Files (Enclosure 6)

M. Conroy U.S. Department of Transportation (this letter and Enclosure 1, via email)

Enclosures:

1. List, Description, and Justification of Changes
2. TNF-XI SAR, Revision 11A; Revision Log, Chapter 1, Chapter 6, Appendix A.6, Appendix B.6, Chapter 7, and Chapter 8 (Proprietary Version)
3. TNF-XI SAR, Revision 11A; Revision Log, Chapter 1, Chapter 6, Appendix A.6, Appendix B.6, Chapter 7, and Chapter 8 (Non-Proprietary Version)
4. Proposed Changes to CoC 9301 Revision 8
5. Listing of Computer Files Contained in Enclosure 6
6. One electronic copy (computer disk) of the Computer Files (Proprietary)
7. Affidavit Pursuant to 10 CFR 2.390

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

AREVA Inc.)
Commonwealth of Virginia) SS:
City of Lynchburg)

I, David Royer, depose and say that I am a Secretary of AREVA Inc., duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information that 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 2 and 6, as listed below:

- Enclosure 2 – Portions of Chapter 1, Chapter 6, Appendix A.6, Appendix B.6, and Chapter 8 for the TNF-XI Safety Analysis Report (SAR), Revision 11A
- Enclosure 6 – Electronic copy (computer disk) of the computer files

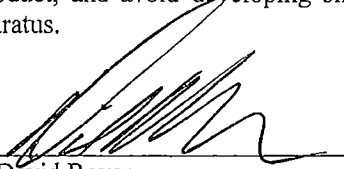
These documents have been appropriately designated as proprietary.

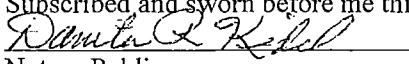
I have personal knowledge of the criteria and procedures utilized by AREVA Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

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 portions of the TNF-XI SAR and computer files associated with the application submittal, all related to the design of the TNF-XI package, 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 is related to the design and analysis of the TNF-XI transportation package, 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 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.


David Royer
Secretary, AREVA Inc.

Subscribed and sworn before me this 13th day of October, 2016.

Notary Public

My Commission Expires: Commission Expires 12/31/16
Registration No. : Registration # 205569



Enclosure 1 to E-45372

List, Description, and Justification of Changes

List, Description, and Justification of Changes
(Safety Analysis Report, TNF-XI, Revision 11A)

Item	Chapter/Appendix/Section	Description and Justification
1	Proprietary Information Notice	Added the Proprietary Information Notice page. A Proprietary Information Notice page was not previously included in the safety analysis report (SAR).
2	Revision Log	Added the Revision Log pages. A revision log was not previously included in the SAR.
3	Chapter 1	Revised Chapter 1 to identify proprietary information in accordance with 10 CFR 2.390. The proprietary markings had been previously identified in accordance with 10 CFR 2.790.
4	Chapter 1, Section 1.1	Added a third paragraph describing a new radioactive content, detailed in Appendix B.6, in the form of powder and scraps mixed with residues consisting of incinerator ashes or earth, sand, and residues from dissolution, identified as Content 7. Added "and Appendix B.6." This appendix is the criticality analysis for a new content, identified as Content 7.
5	Chapter 1, Section 1.2.1.3	Added "with or without residues" and "and Appendices A.6 and B.6." This clarification is for the addition of a new content, identified as Content 7.
6	Chapter 1, Section 1.2.3	Added a third paragraph describing a new radioactive content, in the form of powder and scraps mixed with residues consisting of incinerator ashes or earth, sand and residues from dissolution, identified as Content 7.
7	Chapter 6	Revised Chapter 6 to identify proprietary information in accordance with 10 CFR 2.390. The proprietary markings had been previously identified in accordance with 10 CFR 2.790.
8	Chapter 6, Section 6.1	Added a seventh paragraph describing a new radioactive content, detailed in a new appendix, Appendix B.6, identified as Content 7. Added "contents analyzed in this chapter and Appendix A.6." Added "The Criticality Safety Index (CSI) for the TNF-XI package with the content analyzed in Appendix B.6 is 0.0."

List, Description, and Justification of Changes
(Safety Analysis Report, TNF-XI, Revision 11A)

Item	Chapter/Appendix/Section	Description and Justification
9	Appendix A.6	<p>Revised the Table of Contents, specifically page A.6.ii, the List of Tables, for a minor change to remove the number "1" at the end of the titles for several of the listed tables. The number "1" is a table footnote designator in several of the table titles (Tables A.6-13 through A.6-23 and A.6-32 through A.6-45).</p> <p>Revised pages A.6-5 through A.6-7 and page A.6-65 to identify proprietary information in accordance with 10 CFR 2.390. The proprietary markings had been previously identified in accordance with 10 CFR 2.790.</p>
10	Appendix B.6	<p>Added Appendix B.6, "TNF-XI Criticality Evaluation for Content 7," a new content.</p>
11	Chapter 7	<p>Revised Chapter 7 to identify proprietary information in accordance with 10 CFR 2.390. The proprietary markings had been previously identified in accordance with 10 CFR 2.790.</p>
12	Chapter 7, Section 7.2.1	<p>Deleted the second sentence in the first paragraph. The wording was a duplication of wording in the Certificate of Compliance.</p> <p>Deleted ", per Table 6-1, Table A.6-3" in the second paragraph. Added "as prescribed in the Certificate of Compliance for either." The content details needed for loading various payloads are prescribed in the Certificate of Compliance, including the addition of a new content, identified as Content 7.</p>
13	Chapter 8	<p>Revised Chapter 8 to identify proprietary information in accordance with 10 CFR 2.390. The proprietary markings had been previously identified in accordance with 10 CFR 2.790.</p>