



October 12, 2016
DPG 16-244

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Docket No. 72-11
Rancho Seco Independent Spent Fuel Storage Installation
License No. SNM-2510

Submittal of a Consolidated Version of the Rancho Seco Independent Spent Fuel Storage Installation Final Safety Analysis Report (FSAR) Revision 4

Attention: Jack Parrott and Chris Allen

The April 28, 2016 Part 72 application by Waste Control Specialists (WCS) incorporated by reference the U.S. Nuclear Regulatory Commission's (NRC's) approval of the Rancho Seco Independent Spent Fuel Storage Installation. Noting that the Final Safety Analysis Report (FSAR) through Revision 4 as referenced, for this installation is contained in a number of regulatory submittals (some of which may pre-date NRC's ADAMS electronic document management system), the NRC Staff recently requested that a consolidated updated proprietary FSAR be submitted to the NRC such that it may be incorporated into ADAMS to facilitate agency review.

Accordingly, SMUD provided the requested submittal of a consolidated proprietary FSAR, Revision 4, for the Rancho Seco Independent Spent Fuel Storage Installation, Docket No. 72-11 on August 11, 2016 under cover letter DPG 16-198. In subsequent communications with Waste Control Specialists, it has been brought to SMUD's attention that several proprietary drawings incorporated into Volume 4 of the provided FSAR were unavailable to NRC staff reviewing the WCS application. To facilitate the timely review of the referenced application, SMUD provides this resubmittal of the following Volume 4 drawings:

NUH-05-4001 REVISION 15
NUH-05-4003 REVISION 10
NUH-05-4004 REVISION 16
NUH-05-4005 REVISION 14

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The materials to be docketed are being provided in hard copy. Courtesy electronic copies have previously been provided.

This submittal includes proprietary information, which has all been previously submitted on this docket. In accordance with 10 CFR 2.390, an affidavit (Enclosure 1) is provided specifically requesting that you continue to withhold this proprietary information from public disclosure. Because the purpose of this submittal is to provide a consolidated proprietary version of this FSAR, not associated with any Docket No. 72-11 licensing action, and since public versions of the information are already on the docket where applicable, a public version is not included herein.

If you or members of your staff have questions or require additional information, please contact me by email at dan.tallman@smud.org or by phone at (916) 732-4893.

Sincerely,



Dan A. Tallman
Manager, Rancho Seco Assets

(DT/BG)

Enclosures (5):

- 1) Affidavit pursuant to 10 CFR 2.390
- 2) NUH-05-4001 REVISION 15
- 3) NUH-05-4003 REVISION 10
- 4) NUH-05-4004 REVISION 16
- 5) NUH-05-4005 REVISION 14

Cc: John Nguyen, Project Manager, NMSS/SFM/LB
William Allen, Program Manager Part 72 (without enclosures)
Jack Parrott, Program Manager Part 50 (without enclosures)
RIC: 1F.099

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 listed below:

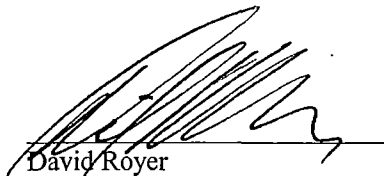
Drawing Number	Revision No.	Drawings	Title
NUH-05-4001	15	NUHOMS MP-187 Multi-purpose Cask Main Assembly (six sheets)	
NUH-05-4003	10	NUHOMS MP-187 Multi-purpose Cask Onsite Transfer Arrangement (two sheets)	
NUH-05-4004	16	NUHOMS FO-DSC and FC-DSC for PWR Fuel Main Assembly (five sheets)	
NUH-05-4005	14	NUHOMS FF-DSC for PWR Fuel Main Assembly (five sheets)	

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.

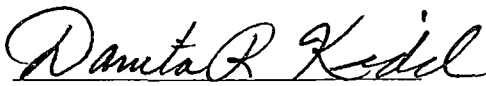
Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves drawings which are owned and 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 descriptions of the design and safety analysis of dry spent fuel storage systems, 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 18th day of October, 2016


Notary Public
My Commission Expires Dec. 31, 2016
Registration No. 205569

