



December 21, 2017
TJT:17:029

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
11555 Rockville Pike
One White Flint North
Rockville MD 20852

SUBJECT: Docket No. 71-9372, AREVA TN-B1 Shipping Container, Application For Approval
For Incorporation of ATRIUM 11 Fuel Assemblies.

References: (1) US NRC Letter dated May 15, 2017 SUBJECT: REQUEST FOR ADDITIONAL
INFORMATION FOR REVIEW OF THE CERTIFICATE OF COMPLIANCE NO.
9372, FOR THE MODEL NO. TN-B1 PACKAGING (CAC NO. L25164)

Your letter, reference (1), provided us 6 Requests for Additional Information (RAI's) regarding
our application for amendment of the Model No. TN-B1 transportation package, Certificate of
Compliance No. 9372. This letter provides our responses to those RAI's.

Attachment A is Affidavit requesting information be withheld from public disclosure in
accordance with 10 CFR 2.390. The attachment affected is Attachment I, FS1-0024572 Rev 3
"TN-B1 Container Thermal Analysis Applicability". For this attachment a non-proprietary version
is also attached.

This letter and all attachments, except for Attachment I, are non-proprietary.

Very Truly Yours

A handwritten signature in black ink, appearing to read 'T. Tate'.

Timothy J. Tate, Manager
Environmental, Health, Safety and Licensing

Copy to
Pierre Saverot (w attachments)
Anthony Hsia (w/o attachments)

AREVA INC.

2101 Horn Rapids Road, Richland WA 99354
Tel.: 509 375 8100 - www.areva.com

NM5570

Attachments:

- A. Affidavit requesting information be withheld from public disclosure in accordance with 10 CFR 2.390
- B. RAI 2-1 Response (Non-Proprietary)
- C. RAI 2-2 Response (Non-Proprietary)
- D. RAI 2-3 Response (Non-Proprietary)
- E. RAI 3-1 Response (Non-Proprietary)
- F. RAI 3-2 Response (Non-Proprietary)
- G. RAI 6-1 Response (Non-Proprietary)
- H. FS1-0014159 Rev 7 "AREVA TN-B1 Docket No. 71-9372 Safety Analysis Report" (Non-Proprietary)
- I. FS1-0024572 Rev 4 "TN-B1 Container Thermal Analysis Applicability" (Proprietary)
- J. FS1-0024572 Rev 4 (NP) "TN-B1 Container Thermal Analysis Applicability" (Non-Proprietary)

AFFIDAVIT

STATE OF WASHINGTON)
COUNTY OF BENTON)

ss:

1. My name is Timothy J. Tate. I am the Manager, Environmental, Health, Safety, & Licensing for AREVA Inc. ("AREVA") at AREVA's Richland, Washington facility and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in **Attachment I** FS1-0024572 Rev 4 "TN-B1 Container Thermal Analysis Applicability" (Proprietary) and referred to herein as "Documents". Information contained in these documents is considered by AREVA as proprietary in accordance with the policies established by AREVA.

4. These Documents contain information of a proprietary and confidential nature and of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information identified and contained in these Documents be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information".

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's processes, equipment, or products.
- (b) Use of the information by a competitor could permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market similar products, equipment, or processes.
- (c) The information reveals certain distinguishing aspects of equipment and products, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (d) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information identified in these Documents is considered proprietary for the reasons set forth above. In particular, AREVA has expended considerable sums of money to develop the products and associated evaluations described in these documents. The release of the AREVA documents would allow a competitor to develop similar products and evaluations without incurring the significant expense of having to develop these products and associated evaluations.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreements providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

T. J. Tate

Timothy J. Tate, Manager
Environmental, Health, Safety, & Licensing

SUBSCRIBED before me this 21st day of December, 2017.

Mary Anne Heilman

Mary Anne Heilman
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: June 6, 2020

