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April 26, 2018  
E-51306

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

Subject: Revision 4 to Application for Amendment 16 to Standardized  
NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel  
Storage Casks (Docket No. 72-1004)

Reference: Revision 3 to Application for Amendment 16 to Standardized  
NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel  
Storage Casks, E-49944 dated November 16, 2017  
(Docket No. 72-1004)

As a result of the public meeting with NRC staff, held on February 28, 2018 to obtain additional feedback regarding the proposed changes to Certificate of Compliance (CoC) No. 1004 as part of the Pilot for Graded Approach for Certificate of Compliance Format, Content, and Selection Criteria review for Amendment 16, TN Americas LLC (TN) is providing this revision to the application. In addition, we are providing for the first time the revised pages for the Updated Final Safety Analysis Report (UFSAR). Based on continuing discussions with NRC staff on the fuel qualification tables discussed in technical specifications (TS) tables and Forms 77 – 79, 81, 85, 86, 88, 90, 91, 93 and 94, these changes have not been included in this submittal. These items are highlighted in certain places in this submittal to indicate that they are incomplete until a firm decision has been made on how and where these will be incorporated.

In cases where there were no comments or questions from the NRC for a particular evaluation form, the revision level indicated is the last revision level where a change was made. For those evaluations in which changes have been made, the revision level is indicated as Revision 4 and the changes in the body of the evaluation form are tracked so that they are clearly discernable. An evaluation form for each of the current CoC requirements is provided in Enclosure 1. Similar evaluation forms for each of the sections of the TS and the TS tables and figures are provided in Enclosures 2 through 7. Please note that the CoC conditions and TS used in these evaluation forms did not include any items added as a result of CoC renewal, as these were not approved at the time of initial CoC Amendment 16 submittal.

Certainly, TN will work with the NRC to ensure appropriate renewal CoC conditions and TS requirements are added in the final Amendment 16 versions. For information, a revised high-level summary of the results of the evaluation is given in Enclosure 8.

To assist in the NRC staff review, TN has word-processed the proposed CoC, CoC Appendix A Inspections, Tests, and Evaluations (ITE), and CoC Appendix B TS. A new CoC Appendix C has also been created in order to provide the ASME Code Alternatives. Resultant changes to the associated UFSAR are also provided for the first time in this submittal. Amendment 16 changes are indicated with italicized text and revision bars in the right-hand margin. The footers of the Amendment 16 UFSAR pages are annotated as "72-1004 Amendment No. 16, April 2018, Revision 4." In order to distinguish changes associated with Amendment 15 (currently under NRC review) on these pages, they are outlined in blue with an indication that these are "Amd 15."

The revised CoC is provided in Enclosure 9, the ITE are provided in Enclosure 10, the TS in Enclosure 11, and the ASME Code Alternatives are provided in Enclosure 12. The UFSAR change pages are provided in Enclosure 13. The NRC feedback document from the February 28, 2018 public meeting is provided for information as Enclosure 14. Certain of the Enclosure 13 UFSAR pages include proprietary information, which may not be used for any purpose other than to support the NRC staff's review of the application. In accordance with 10 CFR 2.390, TN Americas LLC is providing an affidavit (Enclosure 16), specifically requesting that this proprietary information be withheld from public disclosure. Enclosure 15 provides a public version of the Enclosure 13 UFSAR pages.

This submittal is being provided as an electronic submission, using the optical storage media (OSM) provision from Section 4 of the NRC Guidance for Electronic Submissions to the NRC. Accordingly, we have included a Document Components listing and OSM #1 and OSM#2 listings at the end of this cover letter.

Should the NRC staff require additional information to support review of this application, please do not hesitate to contact Dennis Williford at 704-805-2223, or me at 410-910-6881.

Sincerely,



Jayant Bondre  
Chief Technical Officer

cc: John Vera (NRC SFM), as follows:

- One paper copy of this cover letter
- Six computer disks, each containing this cover letter and Enclosures 1 through 16 (i.e., OSM #1 disk)

Enclosures:

1. Evaluation Forms for CoC 1004 CoC Items
2. Evaluation Forms for CoC 1004 TS Section 1 Items
3. Evaluation Forms for CoC 1004 TS Section 2 Items
4. Evaluation Forms for CoC 1004 TS Section 3 Items
5. Evaluation Forms for CoC 1004 TS Section 4 Items
6. Evaluation Forms for CoC 1004 TS Section 5 Items
7. Evaluation Forms for CoC 1004 TS Tables and Figures
8. Amendment 16 High-Level Evaluation Results Summary Table
9. Certificate of Compliance No. 1004 Proposed Amendment 16 CoC
10. Certificate of Compliance No. 1004 Proposed Amendment 16 ITE
11. Certificate of Compliance No. 1004 Proposed Amendment 16 TS
12. Certificate of Compliance No. 1004 Proposed ASME Code Alternatives
13. CoC 1004 Amendment 16, Revision 4 UFSAR Changed Pages (Proprietary Version)
14. NRC February 28, 2018 Feedback on CoC 1004 Amendment 16 Changes
15. CoC 1004 Amendment 16, Revision 4 UFSAR Changed Pages (Public Version)
16. Affidavit Pursuant to 10 CFR 2.390

**Document Components:**

001 Public Cover Letter.pdf, 1,127,023 bytes  
002 Public 1004 AMD 16 Encl 01 Assess CoC.pdf, 220,164 bytes  
003 Public 1004 AMD 16 Encl 02 Assess TS-Sect 1.pdf, 84,160 bytes  
004 Public 1004 AMD 16 Encl 03 Assess TS-Sect 2.pdf, 130,309 bytes  
005 Public 1004 AMD 16 Encl 04 Assess TS-Sect 3.pdf, 99,661 bytes  
006 Public 1004 AMD 16 Encl 05 Assess TS-Sect 4.pdf, 361,362 bytes  
007 Public 1004 AMD 16 Encl 06 Assess TS-Sect 5.pdf, 229,484 bytes  
008 Public 1004 AMD 16 Encl 07 Assess TS-Tbls Figs.pdf, 269,265 bytes  
009 Public 1004 AMD 16 Encl 08 Summary Table.pdf, 83,701 bytes  
010 Public 1004 AMD 16 Encl 09 Proposed CoC.pdf, 315,442 bytes  
011 Public 1004 AMD 16 Encl 10 Proposed ITE.pdf, 138,436 bytes  
012 Public 1004 AMD 16 Encl 11 Proposed TS.pdf, 2,163,550 bytes  
013 Public 1004 AMD 16 Encl 12 Proposed Code Alternatives.pdf, 247,273 bytes  
014 SUNSI 1004 AMD 16 Encl 13 Rev 4 UFSAR Changed Pages.pdf, 1,237,727 bytes, Proprietary  
015 Public 1004 AMD 16 Encl 14 NRC Feedback.pdf, 540,536 bytes  
016 Public 1004 AMD 16 Encl 15 Rev 4 UFSAR Changed Pages.pdf, 1,739,012 bytes  
017 Public 1004 AMD 16 Encl 16 Affidavit.pdf, 817,689 bytes

**OSM#1 (Entire Submittal) (computer disk):**

001 Public Cover Letter.pdf, 1,127,023 bytes  
002 Public 1004 AMD 16 Encl 01 Assess CoC.pdf, 220,164 bytes  
003 Public 1004 AMD 16 Encl 02 Assess TS-Sect 1.pdf, 84,160 bytes  
004 Public 1004 AMD 16 Encl 03 Assess TS-Sect 2.pdf, 130,309 bytes  
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016 Public 1004 AMD 16 Encl 15 Rev 4 UFSAR Changed Pages.pdf, 1,739,012 bytes  
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**OSM#2 (Pubic Portions) (computer disk):**

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