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June 7, 2018

E-51440

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: Application for Revision to Competent Authority Certification,
USA/0653/AF-96 for Validation of French Competent Authority
Certificate F/381/AF-96 for the Model No. TNF-XI

Reference: [1] Competent Authority Certification for a Type AF Fissile
Radioactive Materials Package Design Certificate USA/0653/AF-96,
Revision 11, Revalidation of French Competent Authority Certificate
F/381/AF-96, dated May 12, 2017

Dear Mr. Boyle:

TN Americas LLC, on behalf of TN International, requests a revision to the Competent Authority Certification (CAC) USA/0653/AF-96 to include an approval extension issued as French Certificate of Approval F/381/AF-96 Revision Di that allows transport of a new content, identified as Content No. 8. The current validation approves Content No. 2 and Content No. 7 as described in Appendix 2 and Appendix 7 of the French Certificate of Approval. This request is to extend the CAC USA/0653/AF-96 to allow Content No. 8, Uranium Oxides with impurities, as described in Appendix 8 in the extension of French Certificate of Approval Certificate F/381/AF-96 as Revision Dk. The validation issued as CAC USA/0653/AF-96 should reference both Revisions Di and Dk of the French Certificate of Approval F/381/AF-96 to allow Contents Nos. 2, 7, and 8.

In support of this application for revision, the following enclosures are included:

- Enclosure 1 provides the French Approval Certificate of a Package Design, Number F/381/AF-96 (Revision Di) in English.
- Enclosure 2 provides the French Approval Certificate of a Package Design, Number F/381/AF-96 (Revision Di) in French.
- Enclosure 3 provides the French Approval Certificate of a Package Design, Number F/381/AF-96 (Revision Dk) in English.
- Enclosure 4 provides the French Approval Certificate of a Package Design, Number F/381/AF-96 (Revision Dk) in French.

- Enclosure 5 provides a listing of the TN International SAR changes from the previously submitted consolidated SAR, Revision 7, dated July 16, 2017. These changes are discussed chapter-by-chapter within the SAR.
- Enclosure 6 provides the English translation of Revision 9 for the proprietary version of the TN International SAR, document number DOS-06-00037028-000, Rev. 9.
- Enclosure 7 provides calculation 21003-0604-00, Revision 0. This calculation is a confirmatory calculation in support of the addition of Content No. 8 as presented in Chapter 5A-6 in Enclosure 6 above.
- Enclosure 8 provides TN International's statement of proprietary information pursuant to 49 CFR 7.14, 49 CFR 105.30, and 10 CFR 2.390 to cover Enclosure 6. This document contains TN International's proprietary and business sensitive information.
- Enclosure 9 provides a TN Americas LLC affidavit regarding proprietary information pursuant to 49 CFR 7.14, 49 CFR 105.30, and 10 CF R2.390 to cover Enclosure 7. This document contains TN Americas LLC proprietary and business sensitive information.

TN Americas LLC respectfully requests a review and issuance of Revision 12 of the TNF-XI CAC to include the continued revalidation for Contents No. 2 and 7 per French Certificate of Approval, certificate F/381/AF-96, Revision Di, and the addition of Content No. 8 per French Certificate of Approval, Certificate F/381/AF-96, Revision Dk, on or before January 30, 2019 in order to support a future business need.

Due to the size of this submittal package, computer disks with this cover letter and Enclosures 1 through 9 are being provided to both you and Mr. Conroy of your organization.

Should you or your 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@orano.group.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Scott Edwards', with a stylized, cursive script.

W. Scott Edwards
Director of Transportation

Enclosures:

1. French Approval Certificate Number F/381/AF-96 (Revision Di) in English
2. French Approval Certificate Number F/381/AF-96 (Revision Di) in French
3. French Approval Certificate Number F/381/AF-96 (Revision Dk) in English
4. French Approval Certificate Number F/381/AF-96 (Revision Dk) in French
5. Listing of the TN International SAR Changes, Chapter by Chapter
6. TN International Safety Analysis Report TNF-XI, Revision 9 (Proprietary)
7. TN Americas LLC Calculation 21003-0604-00, Revision 0 (Proprietary)
8. TN International Statement of Proprietary Information Pursuant to 49 CFR 7.14, 49 CFR 105.30, and 10 CFR 2.390
9. TN Americas LLC Affidavit Regarding Proprietary Information Pursuant to 49 CFR 7.14, 49 CFR 105.30, and 10 CFR 2.390

cc: Michael Conroy, U.S. Department of Transportation (one computer disk containing this cover letter and Enclosures 1 through 9)