AFFIDAVIT PURSUANT
TO 10 CFR 2.390

TN Americas LLC)
State of Maryland) SS.
County of Howard)

I, Prakash Narayanan, depose and say that I am Chief Technology Officer of TN Americas LLC, duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which 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 Enclosure 2 and is listed below:

- Enclosure 2 - Portions of various chapters and appendices of the Rancho Seco (RS) ISFSI License Renewal Application (LRA)

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by TN Americas LLC 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 operating experience with spent fuel storage system aging and details of spent fuel storage system aging management studies associated with the renewal of a system using the NUHOMS® technology. The NUHOMS® technology is owned and has been held in confidence by TN Americas LLC.

2) The information is of a type customarily held in confidence by TN Americas LLC and not customarily disclosed to the public. TN Americas LLC 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 TN Americas LLC because the information consists of operating experience with the aging degradation of systems using the NUHOMS® technology and details of spent fuel storage system aging management studies and planned aging management strategies associated with the renewal of a systems using the NUHOMS® technology, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with TN Americas LLC, take marketing or other actions to improve their product's position or impair the position of TN America LLC's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.

A. Prakash

Prakash Narayanan
Chief Technology Officer, TN Americas LLC

Subscribed and sworn before me this 3rd day of August, 2018.

Leslie LeFors

Notary Public
My Commission Expires 9/29/21

LESLIE LEFORS
Notary Public-Maryland
Frederick County
My Commission Expires
September 29, 2021