



Columbia Office
7135 Minstrel Way
Columbia, MD 21045
Tel: (410) 910-6900
@Orano_USA

August 13, 2018
E-51276

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

Subject: ANUH-01.0150, Standardized Advanced NUHOMS® Updated Final Safety Analysis Report (UFSAR), Revision 8, and 10 CFR 72.48 Summary Report for the Period 8/12/16 to 8/13/18, Docket 72-1029

Reference: Letter from Jayant Bondre to NRC Document Control Desk, "ANUH-01.0150, Standardized Advanced NUHOMS® Updated Final Safety Analysis Report (UFSAR), Revision 7, and 10 CFR 72.48 Summary Report for the Period 8/14/14 to 8/11/16, Docket 72-1029," August 11, 2016 (E-45560)

Pursuant to 10 CFR 72.248, TN Americas LLC (TN) has updated ANUH-01.0150, the Standardized Advanced NUHOMS® UFSAR, last updated by the referenced submittal, and herewith submits UFSAR Revision 8 replacement pages and drawings for docketing. This update incorporates changes implemented by TN pursuant to 10 CFR 72.48, for the time period of 8/12/16 to 8/13/18.

The changed areas are marked as follows:

- New or changed pages show "Rev. 8" and "08/18" in the header.
- Changed areas are indicated using single revision bars in the right-hand margin.
- Newly inserted text is shown by italics.
- Changed areas on drawings are enclosed in clouds.

Enclosure 5 herein provides a list of the changes incorporated into UFSAR Revision 8, including a description of the changes and indication of the affected pages and drawing sheets.

I certify that this submittal accurately presents changes made since the referenced submittal.

This submittal includes proprietary information which may not be used for any purpose other than to support NRC staff review of the submittal. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public disclosure. This submittal also

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includes security-related information. Accordingly, two versions of replacement pages, Proprietary and Public, are provided, as Enclosures 2 and 3, respectively.

Also, pursuant to 10 CFR 72.48(d)(2), TN hereby submits the 72.48 summary report for the Standardized Advanced NUHOMS® System for the period 8/12/16 to 8/13/18, as Enclosure 4. The most recent summary report was provided by the referenced submittal.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Dennis Williford at 704-805-2223, or by email at Dennnis.Williford@areva.com.



Paul Oleyar
Vice President

cc: Christian Jacobs (NRC SFM) as follows, in a separate mailing:

- Two paper copies of this cover letter and Enclosures 1, 2, 4, and 5
- Two electronic copies (computer disk) of the ANUH-01.0150, Standardized Advanced NUHOMS® UFSAR, Revision 8 (Proprietary Version)

List of Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement Pages for ANUH-01.0150, Standardized Advanced NUHOMS® UFSAR, Revision 8 (Proprietary Version)
3. Replacement Pages for ANUH-01.0150, Standardized Advanced NUHOMS® UFSAR, Revision 8 (Public Version)
4. 72.48 Summary Report for the Standardized Advanced NUHOMS® System for the Period 8/12/16 to 8/13/18
5. List of Changes to the Standardized Advanced NUHOMS® System UFSAR, Revision 8

AFFIDAVIT PURSUANT
TO 10 CFR 2.390

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

I, Paul Oleyar, depose and say that I am a Vice President 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 the CoC 1029 updated final safety analysis report (UFSAR) chapters and drawings


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.

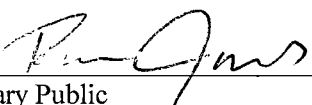
- 1) The information sought to be withheld from public disclosure involves portions of the updated final safety analysis report, related to the design of dry spent fuel storage systems, which are owned and have been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily 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 descriptions of the design of dry spent fuel storage systems, 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 Americas LLC's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.



Paul Oleyar
Vice President, TN Americas LLC

Subscribed and sworn before me this 13th day of August, 2018.



Notary Public

RONDA JONES
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires October 16, 2019

My Commission Expires 10 / 16 / 19

Enclosure 4 to E-51276

**72.48 Summary Report for the Standardized
Advanced NUHOMS® System for the Period
8/12/16 to 8/13/18**

**REPORT OF 10 CFR 72.48 EVALUATIONS PERFORMED FOR THE
STANDARDIZED ADVANCED NUHOMS® SYSTEM FOR THE PERIOD 08/12/16 to
08/13/18**

Licensing Review (LR) 721029-408 Rev. 1 – (no associated UFSAR change)

Change Description

During fabrication of this AHSM-HS, the axial retainer embedments were cast in the wrong location on the base. Rebar was also damaged during the excavation process. This activity involved excavating a pocket in the design location and creating a bearing plate assembly that will function as the axial retainer embedment. An analysis was performed to address the damaged rebar and adequacy of the bearing plate assembly. The axial retainer embedments that were cast in the wrong location were filled with approved mix design concrete. This LR was revised to reconcile the proposed activity with Amendment 3 and to update the licensing references.

Evaluation Summary

A calculation was performed in Revision 0 of this LR to evaluate any effects on the AHSM-HS structural design function caused by the nonconformance. The evaluation summary and conclusions in Revision 0 of this LR remain unchanged and applicable to Revision 1. LR 721029-394 incorporated Amendment 3 into the UFSAR Revision 6.

All eight 72.48 evaluation criteria were met.

**LIST OF CHANGES TO THE
STANDARDIZED ADVANCED NUHOMS® SYSTEM UFSAR, REVISION 8**

FCN (FSAR Change Notice)	Description of Changes	UFSAR Pages Affected	UFSAR Drawing Sheets Affected
None	<p>Changes are made to the updated final safety analysis report (UFSAR) cover page, proprietary notice page, the revision log page, the executive summary, and the list of effective pages (LOEP).</p> <p>For completeness, the pages which have the proprietary notice page, the revision log page, the executive summary, and also the base UFSAR table of contents, list of tables, and list of figures are all included herein.</p> <p>Also, for completeness, because it was changed, the UFSAR Appendix A table of contents, list of tables, and list of figures are all included herein.</p>	<p>Cover page i, ii, iv, v, ix-xxvi (for the base UFSAR) LOEP-1 through LOEP-22 i through xv (for Appendix A)</p>	None
721029-418 Revision 0	These changes reconciled the CoC 1029, Amendment 3 Technical Specifications (TS) requirement in LCO 3.1.1.c – “32PTH2 DSC Bulkwater Removal Medium and Vacuum Drying Pressure,” with the detailed operational steps in the UFSAR for the 32PTH2 DSC.	B.8.1-5 B.8.1-6 B.8.3-2	None
721029-419 Revision 1	These changes made a minor editorial correction to the title and notes of two UFSAR tables (Table 4.4-12 and Table A.4.4-11). The title and notes of these tables in the UFSAR had referenced Technical Specifications 5.2.5.a for temperature monitoring limits. However, CoC 1029 Amendment 3 changed the associated temperature limits to TS 5.2.5.b.	4.4-25a (Table 4.4-12) A.4.4-23 (Table A.4.4-11)	None

**LIST OF CHANGES TO THE
STANDARDIZED ADVANCED NUHOMS® SYSTEM UFSAR, REVISION 8**

FCN (FSAR Change Notice)	Description of Changes	UFSAR Pages Affected	UFSAR Drawing Sheets Affected
721029-420 Revision 1	<p>The following changes were made based on reviews performed for the initial tasking associated with CoC 1029 renewal scoping:</p> <p>The following UFSAR drawings are updated to include the quality classification of each part and add material specification alternates:</p> <ul style="list-style-type: none"> • NUH-05-4010, 24PT1-DSC Main Assembly • ANUH-01-4001, 24PT4 DSC Main Assembly • NUH-03-4011 AHSM Main Assembly <p>Drawing NUH-03-4011 is changed to show the location of the support structure heat shield (Part 60) and to correct an editorial item in Note 36.</p> <p>Page 1.5-1 is corrected to show the new drawing revision levels (Rev. 6 for drawing NUH-05-4010 and Rev. 8 for drawing NUH-03-4011).</p> <p>Page A.1.5-1 is corrected to show Revision 6 for drawing ANUH-01-4001.</p> <p>Tables 2.5-1, A2.5-1, and B.2.5-1 are updated to include the quality classification for coatings and a reference to the UFSAR drawings for the classification of individual parts.</p>	<p>1.5-1 2.5-3 (Table 2.5-1) A.1.5-1 A.2.5-3 (Table A.2.5-1) B.2.5-3 (Table B.2.5-1)</p>	<p>NUH-05-4010 (Sheet 1 of 6) NUH-03-4011 (Sheet 1 of 9) (Sheet 4 of 9) ANUH-01-4001 (Sheet 1 of 8) (Sheet 2 of 8) NOTE: For completeness, although only certain drawing sheets were changed, all associated drawing sheets are included herein.</p>

LIST OF CHANGES TO THE
STANDARDIZED ADVANCED NUHOMS® SYSTEM UFSAR, REVISION 8

FCN (FSAR Change Notice)	Description of Changes	UFSAR Pages Affected	UFSAR Drawing Sheets Affected
721029-421 Revision 0	These changes involve minor editorial corrections to the UFSAR to correct certain cross-references to the thermal modeling of the 24PT1 DSC in the Transfer Cask, from UFSAR Section 4.4.2.5 to UFSAR Section 4.4.3.	4.4-1 4.4-6 4.4-7 4.4-9 4.4-10 4.5-1 4.6-2 4.6-3 4.7-1 4.7-3	None
721029-422 Revision 0	This change clarifies wording in the Executive Summary of the UFSAR to indicate that the transfer casks, licensed under the CoC 1004 Standardized NUHOMS® System, are not considered part of the CoC 1029 Standardized Advanced NUHOMS® System.	Page iv (Executive Summary)	None