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August 20, 2018  
E-52430

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 the Model No. TNF-XI, Supplemental  
Information Needed, EPID L-2018-LLA-0170

References: [1] Letter dated July 30, 2018 from Norma Garcia Santos (U.S.  
Nuclear Regulatory Commission) to Richard W. Boyle (U.S.  
Department of Transportation), Application for the Model No. TNF-XI  
Transport Package - Supplemental Information Needed, EPID L-  
2018-LLA-0170

[2] Letter E-51440, dated June 7, 2018, 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

[3] 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:

This submittal provides responses to the request for supplemental information (RSI)  
forwarded by the NRC letter [1] referenced above.

This submittal contains the following enclosures:

- Enclosure 1 provides each RSI followed by a TN Americas LLC response.
- Enclosure 2 provides a copy of Drawing Numbers 12986-006-A (Revision A) and 12986-006-B (Revision B). Each drawing has been annotated with the English translation of the listed French words.
- Enclosure 3 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 2. These documents contain TN International's 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 February 28, 2019 in order to support a future business need.

Computer disks with this cover letter and Enclosures 1 through 3 are being provided to both you and Mr. Conroy.

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](mailto:Glenn.Mathues@orano.group).

Sincerely,



Sandrine Toupiol  
Business Line Director  
TN Americas LLC

Enclosures:

1. RSI Responses
2. Drawing Numbers 12986-006-A (Revision A) and 12986-006-B (Revision B) (Proprietary)
3. TN International Statement of 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 3)

## **Enclosure 1 to E-52430**

### **RSI Responses**

**RSI 1-1**

Identify the content powder specification to ensure that pyrophoric reactions are not credible during all transport conditions.

In document No. DOS-06-0037028-100, Revision 2, the applicant notes that no leak-tightness inspection criterion is specified for use of the packaging. Since the powder environment does not appear to be controlled, it is not clear what materials specification controls would be in place to ensure that pyrophoricity of the contents is not a credible scenario during all transport conditions.

This information is necessary to ensure compliance with the requirements in paragraphs 614 and 644 of the International Atomic Energy Agency (IAEA) Specific Safety Requirements No. 6 (SSR-6), 2012 Edition.

**TN Response to RSI 1-1**

Safety Analysis Report (SAR) Chapter 0A, Description of the Content, DOS-06-0037028-006 Revision 7, provides a complete description of the material allowed in Content Number 8 (n°8). Materials other than those described in this chapter are not allowed.

Among the described materials, only aluminum may present a pyrophoricity behavior under certain conditions. Aluminum metal contained in Content n°8 comes from insulating material and is under form of thin sheets, fixed on a media. The proportion of aluminum compared to the material of the media is very small. Pyrophoricity risk is only recognized for powdered aluminum metal. The form of the aluminum contained in Content n°8 does not meet all the sine qua non conditions to have a pyrophoricity risk. Therefore a pyrophoric reaction is not credible for Content n°8.

**Impact**

No change as a result of this RSI response.

**RSI 1-2**

Provide all design-basis drawings, as well as any other information provided as part of the application, translated in English.

Various drawings (e.g., Drawing Nos. 12986-006-A and 12986-006-B) were provided in French. The drawings of the package, as well as any other information related to the application, should be translated to English and provided as part of the application to allow the staff to perform an adequate safety review.

This information is necessary to ensure compliance with the requirements in paragraphs 607 and 640 of the IAEA SSR-6, 2012 Edition.

**TN Response to RSI 1-2**

A copy of Drawing Numbers 12986-006-A (Revision A) and 12986-006-B (Revision B) is provided in Enclosure 2. Each drawing has been annotated with the English translation of the listed French words.

**Impact**

No change as a result of this RSI response.

**Enclosure 2 to E-52430**

**Drawing Numbers  
12986-006-A (Revision A) and  
12986-006-B (Revision B)  
(Proprietary)**

Security-Related Information Figure  
Withheld under 10 CFR 2.390

Security -Related Information Figure  
Withheld Under 10 CFR 2.390.



**TN INTERNATIONAL**  
**STATEMENT OF PROPRIETARY INFORMATION**  
**PURSUANT TO 49 CFR 7.14, 49 CFR 105.30, AND 10 CFR 2.390**

I, Eric Delaunay, depose and say that I am the Vice President Operations and Transport of TN International, duly authorized to execute this statement of proprietary information and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. TN Americas LLC on behalf of TN International, is submitting this statement of proprietary information in conformance with the provisions of 49 CFR 7.14 and 49 CFR 105.30 of the U. S. Department of Transportation's (U.S. DOT) regulations, and with the provisions of 10 CFR 2.390 of the Nuclear Regulatory Commission's (NRC) regulations. This information is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. 552, as amended, for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosure 2, as listed below:

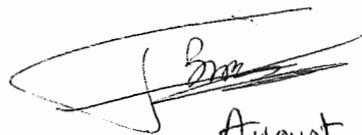
- Enclosure 2 - Drawing Numbers 12986-006-A (Revision A) and 12986-006-B (Revision B)

These documents have been appropriately designated as proprietary.

Pursuant to the provisions of paragraph 7.14 of Part 7 and paragraph (a) (3) of Part 105 of the U.S.DOT regulations, and the provisions of paragraph (b) (4) of Section 2.390 of the NRC regulations the following is furnished for consideration by the U.S.DOT and by the NRC 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 involves specific drawings related to the design and analysis of the TNF-XI Packaging, which are owned and have been held in confidence by TN International.
- 2) The information is of a type customarily held in confidence by TN International and not customarily disclosed to the public. TN International has a rational basis for determining the types of information that is customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of TN International because the information consists of drawing details relating to the design of the TNF-XI Packaging, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with TN International, take marketing or other actions to improve their product's position or impair the position of TN International's product, and avoid developing similar data and analyses in support of their processes, methods, or apparatus.

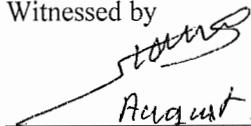
Further the deponent sayeth not.



August 16, 2018

Franck Bimet on behalf of Eric Delaunay, (Signature and date)  
Head of Exploitation/Transport Department  
Business and Operations Transports  
TN International

Witnessed by



August 16, 2018

Alain Sidaine (Signature and date)  
Key Account Manager – Business and Operations Transports  
TN International