

January 24, 2019

Mr. Paul Oleyar
Vice President
TN Americas LLC
7135 Minstrel Way, Suite 300
Columbia, MD 21045

SUBJECT: ORANO REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC
DISCLOSURE (EPID NO. L-2018-LLA-0495)

Dear Mr. Oleyar:

By letters dated December 4, 2018 and January 23, 2019, Orano submitted affidavits, executed by you, requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, Section 2.390:

- Design Drawings
- Safety Analysis Report

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (1) The information sought to be withheld from public disclosure are detailed drawings and a detailed design information associated with the TN-RAM transportation package, which are owned and have been held in confidence by Orano.
- (2) The information is of a type customarily held in confidence by Orano and not customarily disclosed to the public. Orano 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 Orano because the information consists of descriptions of the design of the TN-RAM transportation package, 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 Orano, take marketing or other actions to improve their product's position or impair the position of Orano's product, and avoid developing similar data.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the U.S. Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-6877.

Sincerely,

/RA/

Chris Allen, Project Manager
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9233
EPID NO. L-2018-LLA-0495

SUBJECT: ORANO ASSOCIATES LIMITED REQUEST FOR WITHHOLDING
INFORMATION FROM PUBLIC DISCLOSURE (EPID NO. L-2018-LLA-0495)
DOCUMENT DATE: January 24, 2019

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NAME:	WAllen	SFigueroa via e-mail	BWhite for JMcKirgan
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