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January 22, 2019  
E-53140

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

72-1004

Subject: NUH-003, Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS® Horizontal Modular Storage System for Irradiated Nuclear Fuel, Revision 18

Reference: NUH-003, Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS® Horizontal Modular Storage System for Irradiated Nuclear Fuel, Revision 17, March 12, 2018 (E-50936)

In order to formally incorporate Certificate of Compliance (CoC) No. 1004 Amendment 15 (which was approved by the NRC and became effective on January 22, 2019), TN Americas LLC has updated the referenced UFSAR and herewith submits the subject UFSAR Revision 18. In addition, pursuant to 10 CFR 72.248(c)(5), this update to the UFSAR incorporates changes to the Standardized NUHOMS® System implemented by TN Americas LLC under 10 CFR 72.48 from March 13, 2018 up to and including January 22, 2019.

I certify that this submittal accurately presents changes made from March 13, 2018 up to and including January 22, 2019.

The changed areas are marked as follows.

- New or changed pages show "Revision 18" and "January 2019" in their footer area.
- Changed areas are generally indicated using single revision bars in the right-hand margin. Newly inserted text is generally shown by italics.
- Pages that are only changed by Amendment 15 include a text box with bold text in the footer, which states "All changes on this page are Amd 15."
- Revision bars on Revision 18 pages with no annotation represent 10 CFR 72.48 changes.
- Pages changed by both Amendment 15 and 10 CFR 72.48 are annotated with "Amd 15" adjacent to the applicable revision bars in the right-hand margin for the Amendment 15 changes, and "72.48" adjacent to the applicable revision bar for 72.48. This is to distinguish Amendment 15 changes from 10 CFR 72.48 changes.
- UFSAR drawings have indicators to distinguish 10 CFR 72.48 changes from Amendment 15 changes.

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This submittal includes proprietary information which may not be used for any purpose other than NRC staff use of the UFSAR. 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 includes security-related information. Accordingly, public versions of all replacement UFSAR pages and drawings are provided as Enclosure 3.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Don Shaw at 410-910-6878 or me at 410-910-6859.

Sincerely,

A handwritten signature in black ink, appearing to read "Prakash", with a stylized flourish underneath.

Prakash Narayanan  
Chief Technical Officer

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

- One paper copy of Enclosure 1 and this transmittal letter
- Two electronic copies (computer disk) of the Standardized NUHOMS® UFSAR, Revision 18 (Proprietary Version)

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement Pages and Drawings for the Standardized NUHOMS® System UFSAR, Revision 18 (Proprietary Version)
3. Replacement Pages and Drawings for the Standardized NUHOMS® System UFSAR, Revision 18 (Public Version)

**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 Technical Officer of TN Americas LLC, duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information that 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 meets the provisions of paragraph (a) (4) of Section 2.390 of the Commission's regulations. The information is contained in Enclosure 2, as listed below:

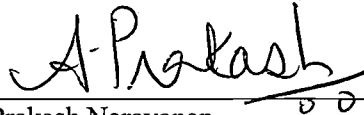
- Enclosure 2 - Portions of Replacement Pages and Drawings for the Standardized NUHOMS® System UFSAR, Revision 18 (Proprietary Version)

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. This document has been appropriately designated as proprietary.

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 the Standardized NUHOMS® dry spent fuel storage system, which is owned by 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 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.



Prakash Narayanan  
Chief Technical Officer, TN Americas LLC

Subscribed and sworn before me this 22<sup>nd</sup> day of January 2019.

  
Notary Public

My Commission Expires 10/16/19

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

