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February 19, 2019
E-53166

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

Subject: Application for Amendment 1 to NUHOMS® EOS Certificate of Compliance No. 1042, Revision 3 – Response to Request for Additional Information (Docket No. 72-1042, CAC No. 001028, EPID: L-2018-LLA-0043)

References: Letter from Christian Jacobs (NRC) to Prakash Narayanan (TN Americas LLC), "TN Americas LLC Application for Certificate of Compliance No. 1042, Amendment No. 1, to NUHOMS® EOS System (Docket No. 72-1042, CAC No. 001028, EPID: L-2018-LLA-0043) – Request for Additional Information," dated December 21, 2018.

Letter from Christian Jacobs (NRC) to Prakash Narayanan (TN Americas LLC), "TN Americas LLC Application for Certificate of Compliance No. 1042, Amendment No. 1, to NUHOMS® EOS System (Docket No. 72-1042, CAC No. 001028, EPID: L-2018-LLA-0043) – Request for Additional Information Part 2," dated January 30, 2019.

This submittal provides responses to the Request for Additional Information (RAI) forwarded by the letters referenced above. Enclosure 2 of this submittal provides a response to each of the RAI items. Each RAI response has a section stating the impact of the response on the application, for both the Technical Specifications (TS) and the Updated Final Safety Analysis Report (UFSAR), indicating which sections, tables, figures, or drawings have been changed. Enclosure 3 provides a public version of Enclosure 2. Enclosure 4 provides a description of additional changes to the UFSAR and TS not associated with the RAI responses. Enclosure 5 provides a listing of CoC 1042 Amendment 1 TS changes resulting from the RAIs and the additional changes per Enclosure 4, and their associated justifications. Enclosure 6 provides a list of changed TS and UFSAR pages by this Amendment 1 Revision 3

Enclosures transmitted herein contain SUNSI. When separated from enclosures, this transmittal document is decontrolled.

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submittal. Enclosure 7 provides a complete revision to the TS, denoted as Amendment 1 Application, Revision 3. Enclosure 8 provides the proprietary version of the UFSAR changed pages and drawings, with the public version of the UFSAR changed pages provided in Enclosure 9. Enclosure 10 provides a copy of Section D to Chapter 6 of Appendix P from the CoC 1004 UFSAR, Revision 16, as part of the response to RAI 7-3 and RAI 7-4. Enclosure 11 provides a listing of the computer files associated with the RAI responses. Enclosure 12 is a computer hard drive containing the computer files listed in Enclosure 11. Enclosure 13 provides a copy of Framatome document FS1-003016, Revision 9 as part of the response to RAI 6-11. Enclosure 14 provides a copy of AREVA Inc. document 51-9230070-000, Revision 0 as part of the response to RAI 8-7. Enclosures 13 and 14 are entirely proprietary and no public version is provided.

For the UFSAR, replacement and new Amendment 1, Revision 3 pages and drawings are provided. The pages are annotated as "72-1042 Amendment 1, Revision 3, February 2019" with changes indicated by italicized text and revision bars. The new changes associated with the RAI responses are further annotated with rectangles enclosing the changed areas and an indication of which RAI is associated with the changes. The new changes associated with Enclosure 4 are further annotated with rectangles enclosing the changed areas and an indication that Enclosure 4 is associated with the changes.

For the TS, Amendment 1 changes on Revision 3 pages are indicated by italicized text, revision bars, and outlined in red to distinguish them from the changes proposed in Revisions 0, 1 and 2 of the Amendment 1 application.

Certain portions of this submittal include proprietary information, which may not be used for any purpose other than to support the NRC staff's review of the application. In accordance with 10 CFR 2.390, TN Americas LLC is providing an affidavit (Enclosure 1) specifically requesting that this proprietary information be withheld from public disclosure. The submittal also includes security-related information. Because Enclosure 12 is an entirely proprietary computer hard drive, no public version is provided.

TN Americas LLC is prepared to meet with the staff to resolve any additional questions the staff might have. Should the NRC staff require additional information to support review of this application, please contact Mr. Glenn Mathues by telephone at (410) 910-6538, or by email at Glenn.Mathues@orano.group.

Sincerely,

A handwritten signature in black ink that reads "A-Prakash". The signature is stylized with a long horizontal stroke at the end.

Prakash Narayanan
Chief Technical Officer

cc: Chris Jacobs (NRC SFM) as follows:

- One paper copy of this cover letter
- Six computer disks containing this cover letter and Enclosures 1 through 11, 13 and 14
- One computer hard drive with Enclosure 12

Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390 ✓
2. Responses to Request for Additional Information (Proprietary Version) ✓
3. Responses to Request for Additional Information (Public Version) ✓
4. Additional Changes Not Associated with the RAIs ✓
5. List of New CoC 1042 Amendment 1 Technical Specification Changes and Justifications ✓
6. List of Changed TS and UFSAR Pages Involved in CoC 1042 Amendment 1, Revision 3 ✓
7. CoC 1042 Proposed Amendment 1, Revision 3 Technical Specifications ✓
8. CoC 1042 Amendment 1, Revision 3 UFSAR Changed Pages (Proprietary and Security-Related Version) ✓
9. CoC 1042 Amendment 1, Revision 3 UFSAR Changed Pages (Public Version) ✓
10. CoC 1004 UFSAR Revision 16 Appendix P, Chapter 6, Section D ✓
11. Listing of Computer Files Contained in Enclosure 12 ✓
12. Computer files Associated with CoC 1042 Amendment 1, Revision 3 (Proprietary) ✓
(One computer hard drive)
13. Framatome Document FS1-0030165, Revision 9 (Proprietary) ✓
14. AREVA Inc. Document 51-9230070-000, Revision 0 (Proprietary) ✓

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