



CoC 1004, Amendment 14

LG-19-089

August 27, 2019

ATTN: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Limerick Generating Station (LGS), Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NFP-85
Docket Nos. 50-352, 50-353, and 72-65

- Subject: Response to Requested Supplemental Information for a One Time Alternative Request Pertaining to Dry Shield Canisters Equipped with BORAL® Neutron Absorber Plates – Copy of the Inspection Procedure
- Reference 1: Exelon Generation Company letter to the NRC, ALTERNATIVE REQUEST PERTAINING TO DRY SHIELDED CANISTERS EQUIPPED WITH BORAL® NEUTRON ABSORBER PLATES, DATED April 8, 2019
- Reference 2: NRC letter to Richard Libra, ALTERNATIVE REQUEST PERTAINING TO DRY SHIELDED CANISTERS EQUIPPED WITH BORAL® NEUTRON ABSORBER PLATES – SUPPLEMENTAL INFORMATION NEEDED, dated June 17, 2019.
- Reference 3 Response to Requested Supplemental Information for a One Time Alternative Request Pertaining to Dry Shield Canisters Equipped with BORAL® Neutron Absorber Plates, dated August 8, 2019

In Reference 1 Exelon Generation Company, LLC (EGC) is requesting NRC approval of a one-time alternative for the Limerick Generating Station (LGS), Units 1 and 2 Independent Spent Fuel Storage Installation (ISFSI) pursuant to Standardized NUHOMS® CoC 1004 Renewed Amendment 14, Technical Specification (TS) 4.1. Specifically, the alternative request addresses use of two Dry Shielded Canisters (DSCs) equipped with BORAL® neutron absorber plates that were subject to different acceptance testing requirements than those specified in CoC 1004 Renewed, Amendment 14.

In Reference 2 the U.S. Nuclear Regulatory Commission (NRC) requested supplemental information. Reference 3 is the EGC response to the request for supplemental information. During the review of Reference 3 the NRC requested a copy of the procedure referenced in the response, procedure, AAR-10012QAP BORAL® INPROCESS AND FINAL INSPECTION. Attachment 2 is a copy of the procedure.

The Attachment Contains Proprietary Information.
When separated from the Attachment this document is decontrolled.

Attachment 1 contains an affidavit from TN Americas LLC which provides the basis for withholding Attachment 2 from public disclosure.

Attachment 2 contains confidential information from a private company of a type customarily held in confidence by the company and not customarily disclosed to the public. Public disclosure of the information withheld is likely to cause substantial harm to the competitive position of TN Americas LLC, because the information consists of descriptions of the design and fabrication of dry spent fuel storage systems, the application of which provide a competitive economic advantage. Therefore, Attachment 2 is being submitted to the Commission with a request that it be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4).

There are no regulatory commitments contained in this letter.

If you have any questions or need additional information, please contact Mr. Joe Dougherty at (610) 718-2630.

Respectfully,



Frank Sturniolo
Acting Vice President – Limerick Generating Station
Exelon Generation Co., LLC

Attachment 1 Affidavit Pursuant to 10 CFR 2.390

Attachment 2 AAR-10012QAP BORAL® INPROCESS AND FINAL INSPECTION

cc: W. Allen
J. McKirgan
S. Rutenkroger

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 is:

E AAR Cargo Systems Procedure, BORAL® In-Process and Final Inspection, AAR-10012 QAP,
Revision 24

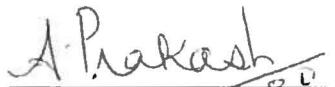
This document has been appropriately designated as proprietary.

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.

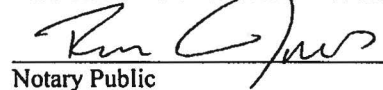
- 1) The information sought to be withheld from public disclosure involves information out of a fabrication document related to the design of the NUHOMS® System, which are owned and have been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN 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 fabrication 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 21 day of August, 2019.


Notary Public

My Commission Expires 10 / 16 / 19

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