


TN Americas LLC)
State of Maryland) SS.
County of Howard)

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 16, as listed below:

- Enclosure 16 - Portions of certain updated final safety analysis report (UFSAR) chapters and appendices

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.

- 1) The information sought to be withheld from public disclosure involves portions of the UFSAR related to the design of the Standardized NUHOMS® dry spent fuel storage 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 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.


Prakash Narayanan
Chief Technical Officer, TN Americas LLC

Leslie LeFors
Notary Public

LESLIE LEFORS
Notary Public-Maryland
Frederick County
My Commission Expires
September 29, 2021

