



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

February 24, 2020

Mr. Dan Tallman  
Manager, Rancho Seco Assets  
Sacramento Municipal Utility District  
Rancho Seco Nuclear Generating Station  
14440 Twin Cities Road  
Herald, CA 95638-9799

SUBJECT: APPROVAL OF SACRAMENTO MUNICIPAL UTILITY DISTRICT REQUEST  
FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR  
RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
(CAC/EPID NOS. 001028/L-2018-RNW-0005; 000993/L-2018-LNE-0004)

Dear Mr. Tallman:

By letter dated July 12, 2019, Sacramento Municipal Utility District submitted an affidavit dated July 10, 2019, and executed by Prakash Narayanan, Chief Technical Officer of TN Americas LLC (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19204A239). You requested that 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:

- Enclosure 2 – RAI Clarifications and Responses
- Enclosure 4 – Rancho Seco ISFSI License Renewal Application, Revision 3
- Enclosure 6 – Design Drawings and Quality Category Assessment Associated with the Response to RAI 2-1 Clarification
- Enclosure 7 – Calculation 67009-TLAA25, Revision 0, Gamma Radiation for Potential Radiolysis of Water at DSC Outer Surface, Associated with the Response to RAI 3-2

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 involves operating experience with spent fuel storage system aging and details of spent fuel storage system aging management studies associated with the renewal of a system using the NUHOMS® technology. The NUHOMS® technology is owned 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 operating experience with the aging degradation of systems using the NUHOMS® technology and details of spent fuel storage system aging management studies and planned aging management strategies associated with the renewal of systems using the NUHOMS® technology, 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 America LLC's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

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

Therefore, the above listed documents 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 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 the date of public disclosure, which will be a reasonable time thereafter.

If you have any questions regarding this matter, please contact me at (301) 415-7116 or [Kristina.Banovac@nrc.gov](mailto:Kristina.Banovac@nrc.gov).

Sincerely,

/RA/

Kristina L. Banovac, Project Manager  
Storage and Transportation Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 72-11  
License No. SNM-2510  
CAC/EPID Nos. 001028/L-2018-RNW-0005  
000993/L-2018-LNE-0004

cc: Rancho Seco Service List  
Prakash Narayanan, TN Americas LLC

Rancho Seco Service List

cc:

Arlen Orchard, Chief Executive  
Officer  
Sacramento Municipal Utility  
District  
6201 S Street  
P.O. Box 15830  
Sacramento, CA 95817-1899

Laura Lewis, Chief Legal  
Officer  
Sacramento Municipal Utility  
District  
6201 S Street  
P.O. Box 15830  
Sacramento, CA 95817-1899

Steve Lins, Deputy General  
Counsel,  
Sacramento Municipal Utility  
District  
6201 S Street  
P.O. Box 15830  
Sacramento, CA 95817-1899

Site Document Control  
Supervisor  
Rancho Seco  
14440 Twin Cities Road  
Herald, CA 95638-9799

Commissioners' Office  
California Energy Commission  
1516 Ninth Street (MS 34)  
Sacramento, CA 95814-5512

Radiation Program Director  
California Radiologic Health  
Branch  
P.O. Box 997414 (MS 7610)  
Sacramento, CA 95899-7414

Sacramento County Board of  
Supervisors  
700 H Street, Suite 2450  
Sacramento, CA 95814

SUBJECT: APPROVAL OF SACRAMENTO MUNICIPAL UTILITY DISTRICT REQUEST FOR  
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR RANCHO  
SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION (CAC/EPID  
NOS. 001028/L-2018-RNW-0005; 000993/L-2018-LNE-0004)

DOCUMENT DATE: February 24, 2020

**DISTRIBUTION:**

DFM r/f

KBanovac, NMSS

G:\SFST\Rancho Seco\License Renewal\Proprietary Review\Rancho Seco ISFSI renewal  
proprietary determination letter for RAI clarification submittal 7-12-19.docx

**ADAMS Accession No.: ML20044F601**

<b>OFFICE</b>	NMSS/DFM	NMSS/DFM	NMSS/DFM
<b>NAME</b>	KBanovac	WWheatley	DDoyle
<b>DATE</b>	2/14/2020	2/14/2020	2/24/2020

**OFFICIAL RECORD COPY**