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June 19, 2020

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Holtec Spent Fuel Pool Heatup Calculation Topical Report
Docket No. 99902086

Subject: Presentation Materials for the Topical Report Pre-submittal Meeting

Please find attached the presentation materials that will be used at the June 19, 2020 pre-submittal meeting. The purpose of the meeting is to discuss Holtec's upcoming submittal of a Topical Report on Spent Fuel Pool Heatup Calculation Methodology.

The presentation material is considered to be proprietary to Holtec. This letter provides three attachments: 1) Proprietary version of the presentation material, 2) Redacted version of the presentation material and 3) a signed affidavit requesting withholding of the proprietary version of the presentation materials in accordance with

Should you have any question or require further information, please contact me at (856) 797-0900 x 3813.

Respectfully,

**Andrea L.
Sterdis**

Digitally signed by Andrea L. Sterdis
DN: cn=Andrea L. Sterdis, c=US,
o=HDI, ou=Holtec
Decommissioning International,
email=andrea.sterdis@holtec.com
Date: 2020.06.19 17:33:50 -04'00'

Andrea L. Sterdis
Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

Attachments:

- 1) Slides for Presubmittal Meeting (Proprietary Version)
- 2) Slides for Presubmittal Meeting (Redacted Version)
- 3) Affidavit for withholding under 10 CFR 2.390

cc:

USNRC Project Manager, NRR/DORL/LLPB-Ekaterina Lenning, Mailstop 12 D20

Attachment 2

Presentation Materials for Holtec Presubmittal Meeting for the

Spent Fuel Pool Heatup Calculation Methodology

Redacted Version

Computational Fluid Dynamics (CFD) Approach for Evaluation of Hypothetical SFP Drain Down Scenario

Redacted Version



a generation ahead by design

June 19, 2020

Holtec International

KPS Technology Campus
1 Holtec Boulevard,
Camden, NJ 08104

1. Overview
2. Proposed Methodology
3. Acceptance Criteria
4. Validation
5. Example Calculations
6. Preliminary Results and Discussion
7. Summary

1. Overview

- Topical Methodology Supports Enhanced Fuel Pool Safety through providing additional insight on Heat Up of Fuel Assemblies
- Utilizes currently approved proven safe methodology.

Attachment 3

Affidavit for Withholding

U.S. Nuclear Regulatory Commission
Pre-Submittal Meeting on Spent Fuel Pool Heatup Calculation Methodology
AFFIDAVIT PURSUANT TO 10 CFR 2.390

- (1) I have reviewed the information described in paragraph (2) which is sought to be withheld, and am authorized to apply for its withholding.
- (2) The information sought to be withheld is marked information provided in the pre-submittal meeting slides for the HDI Spent Fuel Pool Heatup Calculation Methodology. These slides contain Holtec Proprietary information.
- (3) In making this application for withholding of proprietary information of which it is the owner, Holtec International relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4) and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10CFR Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is here sought is all "confidential commercial information", and some portions also qualify under the narrower definition of "trade secret", within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).

- a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by Holtec's competitors without license from Holtec International constitutes a competitive economic advantage over other companies;
- b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
- c. Information which reveals cost or price information, production, capacities, budget levels, or commercial strategies of Holtec International, its customers, or its suppliers;
- d. Information which reveals aspects of past, present, or future Holtec International customer-funded development plans and programs of potential commercial value to Holtec International;
- e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 4.a, 4.b, and 4.d above.

- (5) The information sought to be withheld is being submitted to the NRC in confidence. The information (including that compiled from many sources) is of a sort customarily held in confidence by Holtec International, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by Holtec International. No public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for

- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within Holtec International is limited on a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his designee), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside Holtec International are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- (8) The information classified as proprietary was developed and compiled by Holtec International at a significant cost to Holtec International. This information is classified as proprietary because it contains detailed descriptions of analytical approaches and methodologies not available elsewhere. This information would provide other parties, including competitors, with information from Holtec International's technical database and the results of evaluations performed by Holtec International. A substantial effort has been expended by Holtec International to develop this information. Release of this information would improve a competitor's position because it would enable Holtec's competitor to copy our technology and offer it for sale in competition with our company, causing us financial injury.

- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to Holtec International's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of Holtec International's comprehensive spent fuel storage technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology, and includes development of the expertise to determine and apply the appropriate evaluation process.

The research, development, engineering, and analytical costs comprise a substantial investment of time and money by Holtec International.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

Holtec International's competitive advantage will be lost if its competitors are able to use the results of the Holtec International experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to Holtec International would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive Holtec International of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

U.S. Nuclear Regulatory Commission
Pre-Submittal Meeting on Spent Fuel Pool Heatup Calculation Methodology
AFFIDAVIT PURSUANT TO 10 CFR 2.390

STATE OF NEW JERSEY)
)
COUNTY OF CAMDEN) ss:

Andrea L. Sterdis, being duly sworn, deposes and says:

That she has read the foregoing affidavit and the matters stated therein are true and correct to the best of her knowledge, information, and belief.

Executed at Camden, New Jersey, this 19th day of January, 2020.

Andrea L. Sterdis

Andrea L. Sterdis
Vice President, Regulatory & Environmental Affairs
Holtec Decommissioning International, LLC

Subscribed and sworn before me this 19 day of June, 2020.

Korin M. Fagan

