



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

March 10, 2021

Mr. Richard W. Boyle
Radioactive Materials Branch
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

SUBJECT: APPROVAL TN INTERNATIONAL REQUEST FOR WITHHOLDING
INFORMATION FROM PUBLIC DISCLOSURE OF THE APPLICATION FOR
THE REVALIDATION RECOMMENDATION FOR THE JAPANESE
CERTIFICATE OF APPROVAL NO. J/2009/AF-96, REVISION 1, MODEL NO.
GP-01 PACKAGE (DOCKET NO. 71-3098)

Dear Mr. Boyle:

During the review of Revision No. 1 of the Model No. GP-01, TN International submitted affidavits dated July 27, 2020 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML20231A495] and January 6, 2021 (ADAMS Accession No. ML21013A497), requesting that the information contained in 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:

- 1) Affidavit dated July 27, 2020 – “standards and more generally all the written documents designated as proprietary information;” and
- 2) Affidavit dated January 6, 2021 - TNI Letter COR-20-033226-001 Version 2.0 (Proprietary)

When possible, non-proprietary copies of these documents, as appropriate, were placed in the U.S. Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the ADAMS Public Electronic Reading Room.

In general, the affidavit notes that the information submitted should be considered exempt from mandatory public disclosure for the following reasons:

- The information discloses descriptions of the design and analysis of the Model No. GP-01, where prevention of its use by competitors of TN International (TNI), without license from TNI, constitutes a competitive economic advantage over other companies.
- The information, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacturing, shipment, installation, and assurance of quality or licensing of a similar product.

- The information includes “standards and more generally all the written documents transmitted and information shared and designated as proprietary information held in confidence by TN International.”

Therefore, the version(s) of the submitted information 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.

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 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 of the date of public disclosure in advance which will be a reasonable time thereafter.

If you have any questions regarding this matter, you may contact me at 301-415-6999.

Sincerely,

Norma García Santos, Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-3098
EPID L-2020-LLA-0107 and
L-2021-DOT-0000