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Cc: [Baldner, Heath M. \(hbaldner@nacintl.com\)](#); [dchapman@nacintl.com](#)
Subject: FYI: Approval of NAC International Request for Withholding Proprietary Information from Public Disclosure for NAC-UMS Amendment 8
Date: Friday, April 16, 2021 9:19:00 AM

Wren,

By letter December 18, 2019 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML20006D749), as supplemented on April 24, 2020 (ADAMS Package Accession No. ML20122A201) and August 7, 2020 (ADAMS Package Accession No. ML20227A066), you submitted affidavits dated December 18, 2019, April 24, 2020, and August 7, 2020, requesting that the information contained in these submittals for the Model No. NAC-UMS storage system be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, Section 2.390. The proprietary information in NAC International's (NAC's) response includes the proprietary versions of the following documents:

- NAC-UMS FSAR, Revision 19A,
- List of Drawing Changes associated with FSAR Rev. 19A,
- Calculation No. EA 790-2520, "BWR Fuel Assembly Structural Evaluation,"
- Calculation No. EA 790-2521, "BWR5 Damaged Fuel Can Structural Analysis,"
- Calculation No. EA 790-2522, "Evaluation of Structural Calculations for the BWR Damaged Fuel Configuration,"
- Calculation No. EA 790-3007, "Enhanced VMS BWR Fuel Region and Fuel Tubes Effective Thermal Properties,"
- Calculation No. EA790-3312, "UMS BWR System Internal Pressure Evaluation for Damaged Fuel and Undamaged 10×10 Assemblies,"
- Calculation No. EA790-3507, "UMS - BWR Storage Canister Thermal Analysis," Rev. 07,
- Calculation No. EA790-4601, "TRITON-ARP BWR High Burnup Source Term and Minimum Cool Time Generation,"
- Calculation No. EA790-4602, "UMS 56-Assembly BWR Shielding Analysis for High Burnup Undamaged Fuels,"
- Calculation No. EA 790-4603, "UMS 56- Assembly BWR Damaged Fuel Shielding Analysis,"
- Calculation No. EA 790-4604, "UMS High Burnup BWR Site Dose Calculation,"
- Calculation No. EA 790-4605, "UMS BWR High Burnup Occupational Dose-Exposure Analysis,"
- Calculation No. EA790-5601, "UMS BWR Undamaged Fuel Criticality Analysis For Selected Fuel Types and Increased Absorber Credit,"
- Calculation No. EA 790-5602, "UMS BWR Damaged Fuel Criticality Analysis for Selected Fuel Types,"
- Calculation No. EA790-2521, "BWR5 Damaged Fuel Can Structural Analysis," Rev. 2,
- NAC-UMS FSAR, Revision 20B,
- List of Drawing Changes, associated with FSAR Revision 20B, and

- RAI Responses for NAC-UMS FSAR, Amendment 8, Pages 7-16.

A non-proprietary copy of this document, 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.

The affidavits state that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by competitors of NAC, without license from NAC, constitutes a competitive economic advantage over other companies.
- Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product.
- Information that reveals aspects of past, present, or future NAC customer-funded development plans and programs of potential commercial value to NAC.

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

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, feel free to reach out to me

Docket No. 72-1015
EPID No. L-2019-LLA-0291

Thanks
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