

## **AFFIDAVIT** SUBMITTED BY ENERGYSOLUTIONS CONCERNING CONFIDENTIAL INFORMATION AND TRADE SECRETS

STATE OF SOUTH CAROLINA	]	c c
COUNTY OF LEXINGTON	]	SS.

I, Patrick L. Paquin, depose and say that I am duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified below as proprietary. The following documents and corresponding data files, which are included with our submittal letter E&L-004-08, Safety Analysis Report for the 3-60B Package contains proprietary information that should be withheld from public disclosure:

Attachment 3: Proprietary References, which contains the following proprietary documents and corresponding data files:

ST-551, Rev.1: Validation of the LS-DYNA Drop Analyses Results with the Test Data ST-557, Rev.0: Drop Analysis of the 3-60B Cask Using the LS-DYNA Program

I have personal knowledge of the criteria and procedures utilized by Energy Solutions in designating information as a trade secret or as confidential information of a commercial or financial nature. These calculations contain unique information and methods that have been developed by the EnergySolutions' staff for the evaluation of transportation packagings. These methods are considered confidential information that includes Company trade secrets incorporated into such evaluation processes. The proprietary information submitted to the Commission contains the type of information Energy Solutions regards as protected and of the type not to be disclosed to unauthorized persons.

The information designated here as proprietary is not available from public sources. Public disclosure of this information would cause substantial harm to the competitive position of EnergySolutions. The Company has made substantial investments in salaries and capital equipment and has committed to refine and improve EnergySolutions' radioactive waste management system. Competitors of EnergySolutions would have great difficulty in duplicating the methods developed by EnergySolutions, due not only to the financial investment of Energy Solutions, but also to the unique skills, talents, and expertise of Energy Solutions employees who have developed these concepts. Disclosure of this information could cause EnergySolutions to lose the financial opportunity and business associated with this and other projects similar in nature.

> Patrick L. Paquin General Manager, Engineering & Licensing

STATE OF SOUTH CAROLINA 35. COUNTY OF LEXINGTON

On this 31th day of January 2008, before me, a Notary Public in and for the State of South Carolina, duly commissioned and sworn, personally appeared Patrick Paquin, General Manager, Engineering & Licensing for EnergySolutions, and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written.

Notary Public, State of South Carolina Reserva Summers
Columbia, South Carolina 29210

Wy Commission Expires

Wy 30, 2010