May 28, 2015

Mr. Steven Toelle
Director, Regulatory Affairs
Centrus Energy Corp.
6903 Rockledge Drive
Bethesda, MD 20817-1818

SUBJECT: APPROVAL OF REQUEST TO WITHHOLD PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

Dear Mr. Toelle:

I am responding to Mr. Mario Robles' letter (American Centrifuge Operating, LLC's (ACO's) Regulatory Manager) dated March 20, 2015 (ACO 15-0011), providing the ACO's responses to the March 3, 2015, U.S. Nuclear Regulatory Commission (NRC) staff's request for additional information related to the summary of facility changes for calendar year 2014. Mr. Robles' letter provided an affidavit dated March 20, 2015, and executed by you, requesting the NRC to withhold information contained in Enclosure 3 of ACO 15-0011 from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390.

The affidavit stated that the information submitted in Mr. Robles' March 20, 2015, letter should be considered exempt from mandatory public disclosure for the following reasons:

1. The information sought to be withheld from public disclosure is owned and has been held in confidence by Centrus Energy Corp (Centrus) and/or ACO.

2. The information is of a type customarily held in confidence by Centrus and/or ACO and not customarily disclosed to the public.

3. The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.), where presentation of its use by any of Centrus' and/or ACO's competitors without license from Centrus and/or ACO constitutes a competitive economic advantage over other companies.

4. It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage (e.g., by optimization or improved marketability).

5. Its use 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 a similar product.

6. It reveals cost or price information, production capacities, budget levels, or commercial strategies of Centrus and/or ACO, its customers or suppliers.

7. It reveals aspects of past, present or future Centrus and/or ACO or customer funded development plans and programs of potential commercial value to Centrus and/or ACO.

8. It contains patentable ideas, for which patent protection may be desirable.

9. It reveals information concerning the terms and conditions, work performed, administration, performance under or extension of contracts with its customers or suppliers.

10. There are sound policy reasons behind the Centrus and/or ACO system which includes:

    a. the use of such information by Centrus and/or ACO gives them a competitive advantage over its competitors;

    b. the information is marketable in many ways;

    c. use of the information by competitors would put Centrus and/or ACO at a competitive disadvantage by reducing their expenditure of resources at Centrus' and/or ACO's expense;

    d. each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage;

    e. unrestricted disclosure would jeopardize the position of prominence of Centrus and/or ACO in the world market, and thereby give a market advantage to the competition of those countries; and

    f. Centrus' and/or ACO's capacity to invest assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.

11. The information is being transmitted to the NRC in confidence and, under the provisions of 10 CFR 2.390, is to be received in confidence by the NRC.

12. The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of Centrus' and/or ACO's knowledge and belief.

We reviewed the information provided in your March 20, 2015, letter and the affidavit requesting to withhold this information in accordance with the requirements of 10 CFR 2.390. On the basis of your statements, we have determined that the submitted information sought to be withheld contains proprietary, trade secrets, and commercial or financial information and should be withheld from public disclosure.

Therefore, the document listed above, marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390. 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 NRC. You should also 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.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding" of NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the publicly available records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

If you have any questions regarding this matter, I may be reached at 301-415-7827 or via e-mail to Osiris.Siurano-Perez@nrc.gov.

Sincerely,

/RA/

Osiris Siurano-Perez, Project Manager
Enrichment and Conversion Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 70-7003, 70-7004
License Nos. SNM-7003, SNM-2011

cc: Mr. Steven R. Penrod, Vice President
Mr. Jim Lewis, General Manager
Mr. Mario Robles, Regulatory Manager

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Sincerely,

/RA/

Osiris Siurano-Perez, Project Manager
Enrichment and Conversion Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 70-7003, 70-7004
License Nos. SNM-7003, SNM-2011

cc: Mr. Steven R. Penrod, Vice President
Mr. Jim Lewis, General Manager
Mr. Mario Robles, Regulatory Manager

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