



The enclosure contains proprietary information – withhold from public disclosure under 10 CFR 2.390

November 14, 2017

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852-2738

PROJ 0823

Subject: Oklo Inc, Project 0823  
Risk Analysis and Source Term Technical Report

Oklo is submitting to the NRC a Risk Analysis and Source Term Technical Report as Enclosure 2 to this letter. Oklo is developing a compact fast reactor designed to bring distributed, clean, affordable and reliable nuclear power to high cost power areas of the United States. Oklo is currently completing the conceptual design of the facility and anticipates entering the preliminary design phase.

The Oklo Risk Analysis and Source Term Technical Report provides an overview of the preliminary work associated with risk analysis and source term of the Oklo reactor. The purpose of this report is to familiarize the staff at the U.S. Nuclear Regulatory Commission (NRC) with the Oklo reactor core size and radiological consequences. This report includes information such as key Oklo reactor characteristics, as they apply to risk analysis and source term, preliminary risk analysis with the Systems Analysis Programs for Hands-on Integrated Reliability Evaluations (SAPHIRE) software, initial dose estimates from the MELCOR Accident Consequence Code System (MACCS), and potential work with national laboratories to further quantify the mechanistic source term.

The expected outcome of this report, as described in the Oklo Licensing Project Plan, is to prepare the core team for meetings where discussions can be had on these topics. The value of these discussions, while not providing any regulatory finality, is to give early indications to Oklo of NRC staff impressions of these early calculations. The discussions on these fundamental topics then prepare both the relevant NRC staff and Oklo for future planning discussions for NRC review of an application.

Oklo requests that the Enclosure 2, where indicated as confidential and proprietary utilizing a box in the top right corner, be withheld from public disclosure pursuant to 10 CFR §2.390 due to including detailed confidential and proprietary business information and strategy. Some pages in the enclosure are also marked as export controlled information.

Also enclosed is Oklo's affidavit attesting to the proprietary nature of the information enclosed, as marked with a box on each page containing proprietary information.

If you have any questions or need any additional information, please contact us at hello@oklo.com or (650) 550-0127.

Sincerely,

Jacob DeWitte  
Co-Founder, CEO  
Oklo Inc

Caroline Cochran  
Co-Founder, COO  
Oklo Inc

Y601

NRR



Enclosures: (1) Affidavit and Request for Withholding  
(2) Risk Analysis and Source Term Technical Report

cc (with enclosures):

**Jan Mazza**, Project Manager, Advanced Reactor and Policy Branch, Division of Engineering,  
Infrastructure and Advanced Reactors, Office of New Reactors

**John Segala**, Chief, Advanced Reactor and Policy Branch, Division of Engineering, Infrastructure and  
Advanced Reactors, Office of New Reactors

**John Monninger**, Director, Division of Safety Systems, Risk Assessment, and Advanced Reactors

**Michael E. Mayfield**, Acting Deputy Director, Office of New Reactors

**Vonna Ordaz**, Acting Director, Office of New Reactors

**Michael R. Johnson**, Deputy Executive Director for Reactor and Preparedness Programs

**Victor M. McCree**, Executive Director of Operations

**Catherine Haney**, Regional Administrator, Region II



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## ENCLOSURE 1

### AFFIDAVIT PURSUANT TO 10 CFR 2.390

1. My name is Caroline Cochran. I am the Co-founder and Chief Operating Officer of Oklo Inc. ("Oklo"), and am authorized to make this request for withholding.
2. The purpose of this affidavit is to request withholding of portions of the information herein enclosed, Oklo Inc. Risk Analysis and Source Term Technical Report, from public disclosure, pursuant to 10 CFR 2.390.
3. I am making this request for withholding under the provisions of 10 CFR 2.390(a)(4) of the regulations of the Nuclear Regulatory Commission (NRC) and submitting this affidavit in conformance with the provisions of 10 CFR 2.390(b)(1).
4. Pursuant to the provisions 10 CFR 2.390(a)(4), the following is furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
  - a) The information sought to be withheld from public disclosure is owned by Oklo and has been held in confidence by Oklo and its consultants.
  - b) The information sought to be protected is not available to the public to the best of our knowledge and belief.
  - c) The information is of the type that would customarily be held in confidence by Oklo policy, which holds that information is to be held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:
    - i) It contains information descriptive of proprietary technology, where preventing its use by any of Oklo's competitors without license from Oklo constitutes a competitive economic advantage over other companies.
    - ii) 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.
    - iii) It reveals or can be used to infer cost or price information, production capacities, budget levels, or commercial strategies of Oklo, its customers, or suppliers.
    - iv) It reveals or can be used to infer aspects of past, present, or future Oklo or customer-funded development plans and programs of potential commercial value to Oklo.
    - v) It contains patentable ideas, for which patent protection may be desirable.
    - vi) The use of such information by Oklo gives Oklo a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Oklo competitive position.



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- vii) It includes information that is marketable in many ways. The extent to which such information is available to competitors diminishes Oklo's ability to sell products and services involving the use of the information.
  - viii) Use by our competitor(s) would put Oklo at a competitive disadvantage by reducing their expenditure of resources at our expense.
  - ix) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Oklo of a competitive advantage.
  - x) Unrestricted disclosure would jeopardize the position of prominence of Oklo in the world market, and thereby give a market advantage to the competition of those countries.
  - xi) The capacity of Oklo and its investors to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- d) The information was transmitted to the NRC in confidence and under the provisions of 10 CFR 2.390; it is to be received in confidence by the NRC.

Signed:

Caroline Cochran

10 / 23 / 2017

Date

Subscribed and sworn to (or affirmed) before me, on this \_\_\_ day of \_\_\_, \_\_\_, by Caroline Cochran, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

SEE ATTACHED CERTIFICATE

Signature of Notary Public  
(Name)

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1 \_\_\_\_\_

2 \_\_\_\_\_

3 \_\_\_\_\_

4 \_\_\_\_\_

5 \_\_\_\_\_

6 \_\_\_\_\_

*Signature of Document Signer No. 1*

*Signature of Document Signer No. 2 (if any)*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
 County of SANTA CLARA

Subscribed and sworn to (or affirmed) before me  
 on this 23<sup>RD</sup> day of OCTOBER, 2017,  
 by \_\_\_\_\_  
 Date Month Year

(1) CAROLINE COCHRAN

(and (2) \_\_\_\_\_),  
*Name(s) of Signer(s)*

proved to me on the basis of satisfactory evidence  
 to be the person(s) who appeared before me.



*Place Notary Seal Above*

Signature *Nina Randall*  
*Signature of Notary Public*

**OPTIONAL**

*Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.*

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_ Document Date: \_\_\_\_\_

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_