

STATE OF WASHINGTON        )  
  :  
COUNTY OF BENTON         )        ss

**Timothy J. Tate**, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at Framatome’s Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the Framatome information contained in **Attachment A** FS1-0040260-2.0 Mechanical Inputs to Licensing which provides nuclear fuel and packaging design information for the Framatome, Richland, Washington Fuel Fabrication Facility as required by 10 CFR § 71.0. Information contained in this document is considered by Framatome as “Proprietary” by Framatome in accordance with the document control system and policies established by Framatome for the control and protection of proprietary and confidential information.

3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as Framatome. Competition among these companies including Framatome is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The application for Certificate of Compliance for “MAP PWR Fuel Shipping Package – USA/9319/B(U)F-96”, FS1-0038397 contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in this report is commercial and confidential because it reveals specific information about the Framatome Richland manufacturing facility relative to its

production throughput. All of this information can be used by competitors to gain undue insight into Framatome's commercial relationships, probable cost structure, operations and business.

5. Framatome Inc. will suffer considerable competitive harm if the contents of the license amendment package are made available to Framatome domestic and international competitors. Finally, this material cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 9<sup>th</sup> day of January, 2019.




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Timothy J. Tate  
Manager, Environmental, Health, Safety and Licensing

STATE OF WASHINGTON     )  
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  )     ss  
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On this 9<sup>th</sup> day of January, 2019, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Timothy J. Tate to me known to be the Manager, Environmental, Health, Safety, and Licensing of Framatome Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.

  
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Mary Anne Heilman  
Notary Public in and for the State of Washington, Public  
at Benton, Washington.  
My commission expires: June 6, 2020

