

**Enclosure 3**  
**Affidavit of Withholding**

I, Bennett Lee, Chief Executive Officer, Eden Radioisotopes, LLC (hereinafter, "Eden") do hereby affirm and state:

1. I am the Chief Executive Officer for Eden and I am authorized to execute this affidavit on behalf of Eden.
2. I am further authorized to review the documents sought to be withheld from public disclosure in connection with submittals to the Nuclear Regulatory Commission (NRC).
3. I am also authorized to apply to the NRC for the withholding of the aforementioned documents from public disclosure under 10 CFR 2.390(a)(4) and 9.17(a)(4) on the grounds that the documents contain proprietary or confidential commercial information. The documents Eden seeks to withhold from public disclosure have been marked "Proprietary."
4. On behalf of Eden, I request that attached presentation marked by Eden as "Proprietary" be withheld, in its entirety, by the NRC from public disclosure.
5. In making this application for withholding of proprietary and confidential information of which Eden is the owner, Eden relies on 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4). The proprietary document contains proprietary or confidential commercial information.
6. The proprietary information should be withheld from disclosure by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4), and for the following reasons to be considered pursuant to 10 CFR 2.390(b)(4):
  - i. The presentation contains process and technical information about Eden components and processes.
  - ii. Eden is providing the NRC with the document and information in confidence.
  - iii. The document is now, and has been, held in confidence by Eden. Eden does not customarily make this document available to the public. Eden has not authorized making this document available through public sources.
7. Economic harm would come to Eden with the publication of the document as it would reduce or eliminate the need for any third party to reproduce a Mo-99 manufacturing process similar to Eden and would reduce the competitive position of Eden. The Eden components and processes are considered by Eden to be a very valuable part of our intellectual property and it would be nullify the advantages that Eden will have by utilizing its components and processes if public access is allowed regarding this document. Eden requests that the NRC withhold the attached presentation from public disclosure based on the reasons stated above in paragraph 6.i. through 6.iii.

I declare under penalty of perjury that the foregoing affidavit and statements therein are true and correct to the best of my knowledge, information, and belief.



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Bennett Lee  
Eden Radioisotopes, LLC

Date: July 14, 2020