

## AFFIDAVIT

STATE OF WASHINGTON     )  
  :  
COUNTY OF BENTON     )     ss

**Michael Wilbricht**, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as the Sr Safeguards Specialist in Richland, Washington. I am responsible for the overall administration of the nuclear material control and accounting at Framatome's Richland, Washington nuclear fuel fabrication facility. This affidavit is based on my firsthand, personal knowledge and is submitted in my capacity as the Sr Safeguards Specialist. This affidavit is submitted in accordance with the provisions of 10 CFR § 2.390.

2. I am familiar with the contents of the "Special Nuclear Material (SNM) and Source Material (SM) Physical Inventory Summary Report", dated May 12, 2022, for the Framatome Inc., Richland, Washington Fuel Fabrication Facility, which provides summary reporting of the plant's annual SNM LEU and HEU inventory as required by 10 CFR § 74.17. This notification is designated 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 and delivering SNM to other nuclear fuel fabricators in foreign countries for inclusion in nuclear fuel assemblies. 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 “Special Nuclear Material (SNM) and Source Material (SM) Physical Inventory Summary Report” 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 this information can be used by competitors to gain undue insight into Framatome’s commercial relationships, probable cost structure, operations, and business.

5. Framatome will suffer considerable competitive harm if the content of the “Special Nuclear Material (SNM) and Source Material (SM) Physical Inventory Summary Report” is made available to Framatome’s domestic and international competitors because of the potential to undermine the financial position of Framatome. Finally, this information cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 12<sup>th</sup> day of May 2022



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Michael Wilbricht  
Sr. Safeguards Specialist

SUBSCRIBED before me this 12<sup>th</sup> day of May 2022.



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Katherine Kerr  
Notary Public in and for the STATE OF WASHINGTON  
Residing at Richland, Washington.  
My commission expires: September 12, 2022

