



X Energy, LLC
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26-May-2022
Project No. 99902071

2022-XE-NRC-014

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

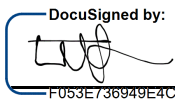
Subject: Addendum to X Energy, LLC Regulatory Engagement Plan Update 2022

Reference 1: Letter dated May 10, 2022, from T. Chapman to U.S. Nuclear Regulatory Commission, "Submittal of X Energy, LLC (X-energy) Xe-100 U.S. Regulatory Engagement Plan 2022 Update," X-energy Reference Number 2022-XE-NRC-012.

The purpose of this letter is to provide additional information regarding X Energy, LLC (X-energy) participation in the Advanced Reactor Demonstration Program (ARDP) in relation to ongoing and proposed preapplication engagement activities described in Reference 1. On April 1, 2021 X-energy, Energy Northwest, and Grant County Public Utility District signed a joint memorandum of understanding to establish the TRi Energy Partnership (TEP) to support the development and commercial demonstration of the Xe-100 reactor technology through ARDP. Over the past year all parties have participated in project development and due diligence efforts. Enclosure 1 provides a brief overview of major decision milestones for the parties involved in the partnership. Due to the business sensitive and predecisional nature of the information, X-energy is requesting the enclosure be withheld from public disclosure in accordance with 10 CFR 2.390. Enclosure 2 is the supporting affidavit for this request.

This letter contains no commitments. If you have any questions or require additional information, please contact Ingrid Nordby at inordby@x-energy.com.

Sincerely,

DocuSigned by:


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Travis Chapman
Manager, U.S. Licensing, Xe-100 Program
X Energy, LLC

cc:
X-energy, LLC
George Vanderheyden
Steve Miller

Nuclear Regulatory Commission



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Enclosures:

- 1) Memorandum: X Energy, LLC and TRi Energy Partnership (TEP) Decision Milestones for the Advanced Reactor Demonstration Program (Proprietary)
- 2) Affidavit



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Enclosure 1

**Memorandum: X Energy, LLC and TRi Energy Partnership (TEP) Decision Milestones for the
Advanced Reactor Demonstration Program
(Proprietary)**



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Enclosure 2

Affidavit



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Affidavit Supporting Request for Withholding from Public Disclosure (10 CFR 2.390)

I, Travis A. Chapman, Manager, U.S. Licensing, Xe-100 Program, of X Energy, LLC (X-energy) do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of X-energy. I am further authorized to review information submitted to or discussed with the Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure. The purpose of this affidavit is to provide the information required by 10 CFR 2.390(b) in support of X-energy's request for proprietary treatment of certain commercial information submitted in Enclosure 1 to X-energy's letter XE-NRC-2022-014 from myself to the NRC which provides an addendum to the X Energy, LLC, Regulatory Engagement Plan Update 2022.

2. I have knowledge of the criteria used by X-energy in designating information as sensitive, proprietary, confidential, and export-controlled.

3. Pursuant to the provision of paragraph (b)(4) of 10 CFR 2.390, 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 in Enclosure 1 is owned by X-energy. This information was prepared with the explicit understanding that the information itself would be treated as proprietary and confidential and has been held in confidence by X-energy.

b. The information sought to be protected in Enclosure 1 is not available to the public.

c. The information contained in Enclosure 1 is of the type that is customarily held in confidence by X-energy, and there is a rational basis for doing so. The information X-energy is requesting to be withheld from public disclosure includes technical information related to the design, analysis and operations associated with our Xe-100 high-temperature, gas-cooled, pebble bed advanced reactor design that directly impact our business development and commercialization efforts. X-energy limits access to this proprietary and confidential information in order to maintain confidentiality.

d. Enclosure 1 contains information about the planned activities of X-energy related to the development of the Xe-100 design bases, forecast design development timeframes, and relate to the commercialization strategy for our Xe-100 advanced reactor. Public disclosure of the information contained in Enclosure 1 would create substantial harm to X-energy because it would reveal valuable technical information regarding X-energy's design development, competitive expectations, assumptions, current position and strategy. Its use by a competitor could substantially improve the competitor's position in the design, manufacture, licensing, construction and operation of a similar competing product.



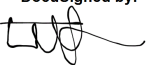
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e. Additionally, Enclosure 1 is assessed to contain certain information that is considered Export Controlled Information (ECI) under the provisions of 10 CFR 810. I have personal knowledge of the criteria used by X-energy to evaluate documents for ECI and affirm that this information should be withheld from public disclosure.

f. The Proprietary Information contained in Enclosure 1 is 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. The information is properly marked.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on May 26, 2022.

Sincerely,

DocuSigned by:

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Travis Chapman
U.S. Licensing Manager, Xe-100 Program
X Energy, LLC