



February 17, 2022

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738  
Washington, DC 20555-0001

**Subject:** BWX Technologies, Inc. Response to Regulatory Issue Summary 2020-02

**Reference:** NRC Regulatory Issue Summary 2020-02, "Process for Scheduling and Allocating Resources for Fiscal Years 2023–2025 for the Review of New Licensing Applications for Light-Water Reactors and Non-Light-Water Reactors," dated August 31, 2020 (ML20202A496)

The referenced Regulatory Issue Summary (RIS) was issued by the Nuclear Regulatory Commission (NRC), in part, to "to assist the NRC in determining fiscal years (FY) 2023 through 2025 resource and budget needs ...[including] pre-application activities, technical and topical report submissions." The purpose of this letter is to provide the BWX Technologies, Inc. (BWXT) voluntary response to NRC RIS 2020-02.

BWXT recognizes the value in early communication of planned licensing activities with the NRC. To that end, the enclosure to this letter contains the RIS response regarding the BWXT Advanced Nuclear Reactor (BANR) risk reduction project under the Department of Energy's Advanced Reactor Demonstration Program (ARDP). The response is considered proprietary and BWXT requests it be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390.

This letter makes no regulatory commitments nor does it make any revisions to existing regulatory commitments.

If you have any questions or need further information, please contact Archie Manoharan at (434) 363-0498 or [amanoharan@bwxt.com](mailto:amanoharan@bwxt.com)

Sincerely,



Joseph K. Miller  
President, BWXT Advanced Technologies LLC

CC:  
Michael Orenak, NRC  
William Kennedy, NRC

AFFIDAVIT OF Joseph K. Miller

STATE OF VIRGINIA

CITY OF LYNCHBURG

I, Joseph K. Miller, being duly sworn, do hereby depose and say:

1. I am a citizen of the United States of America. I am a resident of Evington, Virginia. My birth date is April 12, 1979.
2. I am presently employed by BWXT in Lynchburg, Virginia. I am the President of BWXT Advanced Technologies LLC and have held this position since January 16, 2021. I have personal knowledge of the facts set forth in this affidavit, and if called and sworn as a witness in a deposition or before any court, I could and would testify competently under oath to these facts.
3. BWXT requests that NRC withhold from public disclosure, the enclosure to the letter dated February 17, 2022 that is marked as "BWXT Confidential Commercial Information".
4. I have personal knowledge of the criteria and procedures used by BWXT in designating confidential commercial information as proprietary. Public disclosure of the activities associated with the ARDP BANR project could compromise BWXT's competitive position. Information about BWXT initiatives to accelerate the BANR design and commercialization could erode BWXT's competitive position regarding our overall strategy.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is a true and correct statement of facts.

*JK Miller*

\_\_\_\_\_  
Joseph K. Miller

Subscribed and sworn to before me this 17<sup>th</sup> day of February, 2022

*Liza Malada-Vorel Spruill*  
\_\_\_\_\_  
Notary Public: Liza Malada-Vorel Spruill

My commission expires: 12-31-2023

