

August 30, 2022

AFFIDAVIT OF ROBATEL TECHNOLOGIES, LLC
CONCERNING CONFIDENTIAL INFORMATION AND TRADE SECRETS
PURSUANT TO 10 CFR 2.390

Commonwealth of Virginia
County of Roanoke

I, Jared Bower, depose and say that I am duly authorized to make this affidavit and have reviewed or caused to have reviewed the information which is identified below as proprietary, confidential and/or trade secret information that should be withheld from public disclosure according to 10 CFR 2.390(b). The documents listed in this Affidavit and corresponding data files are included with our submittal letter as part of our SAR Revision 8 submittal.

Enclosure 1: SAR, Revision 8, dated: August 29, 2022. Content as identified.

Safety Analysis Report Sections:

- 1) Table of Contents, List of Figures: 2.12.4-1 through 2.12.4-30
- 2) Attachments 1.4-1 to 1.4-8
- 3) Appendix 2.12: Impact Limiter Analysis
- 4) Appendix 2.14: Appendix – Fabrication Stress Evaluation
- 5) Section 2.16: Reference 64
- 6) Table 3.2.1-1: Temperature-Independent Material Properties, Lines 9 to 17
- 7) Figure 3.3.1-1: RT-100 ANSYS Finite Element Model Volumes
- 8) Figure 3.3.1-2: RT-100 ANSYS Normal Condition Finite Element Mesh
- 9) Section 3.4.1.3: HAC Fire Analysis (entire section)
- 10) Section 3.4.2.3: HAC Fire and Cool-down Analysis (entire section)
- 11) Section 3.6: References 10, 11 and 12
- 12) Figure 4.1.2-1: Illustration of Containment Boundary
- 13) Section 5.3: Shielding Model, Introduction paragraph lines 9 to 13.
- 14) Section 5.3.1: Configuration of Source and Shielding (entire section)
- 15) Table 5.3.2-1: RT-100 Material Composition Summary, lines 9 to 16 and Table footer
- 16) Section 5.4.1: Methods
- 17) Figure 5.4.4-1: Fluctuation in Radial Dose Rates (Cs-137)
- 18) Section 5.5.1: Radiation Level Summary
- 19) Section 5.5.2: Source Specification
- 20) Section 5.5.3: Shielding Model
- 21) Section 5.5.4: Geometry and Materials
- 22) Section 5.5.5: Tally Structure Including Figure 5.5.5-1 through Figure 5.5.5-4
- 23) Figure 5.5.6-1: Cs-137 Mesh Tally – NCT Side (500 lbs – Case 1)
- 24) Figure 5.5.6-2: Co-60 Mesh Tally – NCT Side (500 lbs – Case 7)
- 25) Section 5.6.1: Radiation Level Summary
- 26) Section 5.6.2: Source Specification
- 27) Section 5.6.3: Shielding Model
- 28) Section 5.6.4: Geometry and Materials including Figure 5.6.4-1 through Figure 5.6.4-4.

- 29) Section 5.6.5: Tally Structure including Tables 5.6.6-1 through 5.6.6-12, Figure 5.6.6-1, and Figure 5.6.6-2
- 30) Section 5.8: References 15, and 16
- 31) Section 8.1.5.2: O-rings
- 32) Section 8.1.5.3: Ceramic Paper
- 33) Section 8.1.5.5: Carbon Steel and Alloy Steel Fasteners
- 34) Section 8.1.5.6: Stainless Steel Fasteners
- 35) Section 8.1.5.7: Thread Inserts
- 36) Appendix 8.3, Section 8.3.2: Minimum Lead Thickness and Gap Determination

I have personal knowledge of the criteria and procedures utilized by Robatel Technologies in designating information as a trade secret or as confidential information of a commercial or financial nature. These calculations contain unique information and methods that have been developed by Robatel Technologies, LLC for the design and engineering evaluation of transportation packages. These methods are considered confidential information that includes company trade secrets incorporated into such evaluation processes. The proprietary information submitted to the NRC contains the type of information Robatel Technologies regards as protected and of the type not to be disclosed to unauthorized persons.

The information designated here as proprietary is not available from public sources. Public disclosure of this information would cause substantial harm to the competitive position of Robatel Technologies, LLC. The company has made substantial resource and monetary investments to the development of the RT-100 Type B radioactive waste transport package. Competitors of Robatel Technologies, LLC would have great difficulty in duplicating the methods developed by Robatel Technologies, LLC, due not only to the financial investment of Robatel Technologies, but also to the unique skills, talents and expertise of Robatel Technologies, LLC employees and its trusted engineering resources who have developed these concepts and mathematical models. Disclosure of this information would cause Robatel Technologies, LLC irreparable financial harm and loss of business associated with this and other projects similar in nature.

Respectfully,

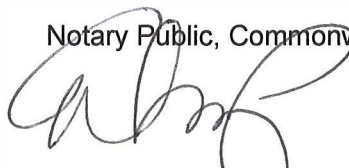
Jared Bower, CEO
Robatel Technologies, LLC
Commonwealth of Virginia
County of Roanoke



On this 30th day of August 2022, be me, a Notary Public in and for the Commonwealth of Virginia, duly commissioned and sworn, personally appeared Jared Bower, CEO for Robatel Technologies, LLC and on oath stated that he was authorized to make this affidavit on behalf of the corporation.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal the day and year first above written

Notary Public, Commonwealth of Virginia, County of Roanoke



ERIKA MARIA PETRAZIO

<p>ERIKA MARIA PETRAZIO NOTARY PUBLIC COMMONWEALTH OF VIRGINIA MY COMMISSION EXPIRES MAY 31, 2026 COMMISSION # 7808325</p>
