

JAPAN ATOMIC ENERGY AGENCY
STATEMENT OF PROPRIETARY INFORMATION
PURSUANT TO 49 CFR 7.14, 49 CFR 105.30, AND 10 CFR 2.390

I, Kunihiko Tsuchiya, depose and say that I am Japan Atomic Energy Agency (JAEA) duly authorized to execute this statement of proprietary information and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. Edlow International Company on behalf of JAEA is submitting this statement of proprietary information in conformance with the provisions of 49 CFR 7.14 and 49 CFR 105.30 of the Department's regulations, and with the provisions of 10 CFR 2.390 of the Commission's regulations. This information is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. 552, as amended, for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosures 4,5 and 6, as listed below:


- Enclosure 4 "English version of SAR for JRF-90Y-950K"
- Enclosure 5 "Summary of Change of SAR for JRF-90Y-950K"
- Enclosure 6 "Revision Comparison Table for Type JRF-90Y-950K SAR"

These documents have been appropriately designated as proprietary.

Pursuant to the provisions of paragraph 7.14 of Part 7 and paragraph (a) (3) of Part 105 of the Department regulations, and the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations the following is furnished for consideration by the Department and by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced documents, should be withheld.

- 1) The information sought to be withheld involves portions of the Safety Analysis Report for JRF-90Y-950K Nuclear Fuel Package related to the design and analysis of JRF-90Y-950K Nuclear Fuel Package, which are owned and have been held in confidence by JAEA.
- 2) The information is of a type customarily held in confidence by JAEA and not customarily disclosed to the public. JAEA has a rational basis for determining the types of information that is customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of JAEA because the information consists of descriptions of the design and analysis of JRF-90Y-950K Nuclear Fuel Package, as well as company business sensitive information, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with JAEA, take marketing or other actions to improve their product's position or impair the position of JAEA product, and avoid developing similar data and analyses in support of their processes, methods, or apparatus.

Further the deponent sayeth not.



Kunihiko Tsuchiya
Director, Department of JMTR.
Japan Atomic Energy Agency

Date 2. Feb., 2023

Witnessed by

 Date 2. Feb., 2023

Masataka Tanimoto
General Manager,
JMTR Reactor Section Department of JMTR.
Japan Atomic Energy Agency