

ORANO NPS
STATEMENT OF PROPRIETARY INFORMATION
PURSUANT TO 49 CFR 7.14, 49 CFR 105.30, AND 10 CFR 2.390

I, Jessica Boutteau, depose and say that I am the Director Transport Operations & Business of Orano NPS, 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. TN Americas LLC on behalf of Orano NPS, is submitting this statement of proprietary information in conformance with the provisions of 49 CFR 7.14 and 49 CFR 105.30 of the U. S. Department of Transportation's (U.S. DOT) regulations, and with the provisions of 10 CFR 2.390 of the Nuclear Regulatory Commission's (NRC) 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 COR-22-0044420-00, "Subject: request for Additional Information," dated 25 May 2023. The proprietary information is the answer in its entirety to a request for information is needed by the NRC staff to determine compliance with the regulatory requirements of IAEA SSR-6, Revision 1, 2018 Edition.

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

- 1) The information sought to be withheld involves is the Safety Analysis Report (SAR) for the Model FCC-3 and FCC-4 package. The SAR has been held in confidence by Orano NPS.
- 2) The information is of a type customarily held in confidence by Orano NPS and not customarily disclosed to the public. Orano NPS 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 Orano NPS because the information consists of descriptions of the design and analysis of the FCC-3 and FCC-4 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 Orano NPS, take marketing or other actions to improve their product's position or impair the position of Orano NPS products, and avoid developing similar data and analyses in support of their processes, methods, or apparatus.

Further the deponent sayeth not.

Jessica Boutteau
Director Transport Operations & Business
Orano Nuclear Packages and Services

Witnessed by

Brigitte Latour
Project Manager
Orano Nuclear Packages and Services