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21-November-2023

2023-PLM-NRC-002

Project No. 99902117

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

“Submittal of Project Long Mott Presentation Materials - Xe-100 Preliminary Safety Analysis Report (PSAR) Chapter 2 “Site Characteristics” and Environmental Report”

This letter provides the X Energy, LLC (X-energy) presentation material on behalf of Project Long Mott for the upcoming “Xe-100 PSAR Chapter 2 “Site Characteristics” and Environmental Report” U.S. Nuclear Regulatory Commission pre-application engagement meeting (Enclosure 1), to be scheduled in December 2023. This submission provides both proprietary and non-proprietary versions of the presentation materials.

The presentation contains commercially sensitive, proprietary information; as such, it is requested that Enclosure 3 be withheld from public disclosure per 10 CFR 2.390, “Public inspections, exemptions, requests for withholding” paragraph (a)(4). Redacted information is identified using [[]]^P. An affidavit certifying the basis for the request to withhold Enclosure 3 from public disclosure is included as Enclosure 1. Proprietary information has been omitted from the presentation materials provided in Enclosure 2 that should be made publicly available.

This letter and enclosures make no new or revised regulatory commitments. Should you have any questions regarding this presentation, please contact Bobby Kunkle at bkunkle@x-energy.com.

Sincerely,

A handwritten signature in black ink that reads 'S. Vaughn'.

Stephen Vaughn
Licensing Manager, Project Long Mott
X Energy, LLC

Enclosures:

- 1) Affidavit Supporting Request for Withholding from Public Disclosure (10 CFR 2.390)
- 2) Presentation Materials - “Submittal of Project Long Mott Presentation Materials - Xe-100 Chapter 2 “Site Characteristics” and Environmental Report” –Non-Proprietary (Public)
- 3) Presentation Materials - “Submittal of Project Long Mott Presentation Materials - Xe-100 Chapter 2 “Site Characteristics” and Environmental Report” Proprietary (Non-Public)



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cc:

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David Bannister

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Department of Energy – Office of Clean Energy Demonstrations:

Jeff Ciocco

Enclosure 1: Affidavit Supporting Request for Withholding from Public Disclosure (10 CFR 2.390)

I, Travis Chapman, Director, Reactor Licensing & Regulatory Affairs, of X Energy, LLC (X-energy) do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of X-energy and Project Long Mott (the “Project”). I am further authorized to review information submitted to or discussed with the U.S. 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 and the project’s request for proprietary treatment of certain commercial information submitted in Enclosure 3 to X-energy’s letter 2023-PLM-NRC-002 from myself to the NRC which provides: “Submittal of Project Long Mott Presentation Materials - Xe-100 Preliminary Safety Analysis Report (PSAR) Chapter 2 “Site Characteristics” and Environmental Report”.
2. I have knowledge of the criteria used by X-energy and the Project 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 3 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 and other Project participants.
 - b. The information sought to be protected in Enclosure 3 is not available to the public.
 - c. The information contained in Enclosure 3 is of the type that is customarily held in confidence by X-energy and the Project, and there is a rational basis for doing so. The information X-energy is requesting to be withheld from public disclosure includes Project development and schedule-related information related to Project stakeholder’s planning, licensing approach and strategy, and commercialization efforts, including certain details that may be Predecisional in nature. X-energy limits access to this proprietary and confidential information in order to maintain confidentiality.
 - d. Enclosure 3 contains information about the planned activities of X-energy and the Project related to the development of the Xe-100 plant as implemented at the Seadrift location’s design bases, forecast design development timeframes, and relate to the commercialization strategy for the Project. Public disclosure of the information contained in Enclosure 3 would create substantial harm to X-energy and the Project because it would reveal valuable technical information regarding 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. The Proprietary Information contained in Enclosure 3 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 using [[]]^P.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this 21st day of November 2023.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Chapman', written over a horizontal line.

Travis Chapman
Director, Reactor Licensing & Regulatory Affairs
Xe-100 Program
X Energy, LLC