

MITSUBISHI ELECTRIC CORPORATION

AFFIDAVIT

I, Hozumi Kadohara, state as follows:

1. I am the General Manager of Nuclear Power Department, Energy Systems Center of Mitsubishi Electric Corporation ("MELCO"), and have been delegated the function of reviewing MELCO's digital platform documentation to determine whether it contains information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential.
2. In accordance with my responsibilities, I have reviewed the enclosed document (refer to Table 1), and have determined that portions of the document contain proprietary information that should be withheld from public disclosure. Those pages containing proprietary information are identified with the label "Proprietary" on the top of the page and the proprietary information has been bracketed with an open and closed bracket as shown here "[]". The first page of the document indicates that all information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).
3. Pursuant to 10 C.F.R. § 2.390 (b)(4), the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information has been held in confidence by MELCO.
 - (ii) The information identified as proprietary in the enclosed document has in the past been, and will continue to be, held in confidence by MELCO and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
 - (iii) The information is being transmitted to the Commission in confidence and, it is to be received in confidence by the Commission.
 - (iv) The information is not readily available in public sources.
 - (v) Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of MELCO.
4. I have personal knowledge of the criteria and procedures utilized by MELCO in designating information as a trade secret, privileged, or as confidential commercial or financial information. Some examples of categories of information which fit into the definition of proprietary information are:
 - (a) Information which reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) whose use by any of the MELCO's competitors, without a license from MELCO, would constitute a competitive economic disadvantage to MELCO.
 - (b) Information which consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), and the application of the data secures a competitive economic advantage.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.

- (d) Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of MELCO, its customer, its partners, or its suppliers.
- (e) Information which reveals aspects of MELCO or customer funded development plans or programs of commercial value to MELCO.
- (f) Information which consists of patentable ideas.

Information to be withheld is considered to be proprietary based on the reasons set forth in paragraphs 4 (a), (b), (c) and (f) above.

5. Public disclosure of the referenced information would assist competitors of MELCO in their design of nuclear power plants without incurring the costs or risks associated with the design and testing of the subject systems. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MELCO in the nuclear plant market:
 - A. Loss of competitive advantage due to the costs associated with development and testing for MELTAC. Providing public access to such information permits competitors to duplicate or mimic MELTAC design without incurring the associated costs.
 - B. Loss of competitive advantage created by benefits of enhanced plant safety, and reduced operation and maintenance costs associated with MELTAC, for nuclear power plants.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Table 1 The information sought to be withheld is contained in the document.

No.	Document title	File name	Rev.
1	Response to RAI 1 for L-2023-TOP-0036	001_JEXU-1041-2133-R1_Response to RAI 1 for L-2023-TOP-0036_P	1
2	Response to RAI 6 for L-2023-TOP-0036	001_JEXU-1041-2138-R1_Response to RAI 6 for L-2023-TOP-0036_P	1
3	Response to RAI 7 for L-2023-TOP-0036	001_JEXU-1041-2139-R1_Response to RAI 7 for L-2023-TOP-0036_P	1

Executed on this 23rd day of August 2024.



Hozumi Kadohara
 General Manager of Nuclear Power Department, Energy Systems Center
 Mitsubishi Electric Corporation