

STATE OF WASHINGTON     )  
  :  
COUNTY OF BENTON        )     ss

**Timothy J. Tate**, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at Framatome's Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the contents of "Attachment 2 : Integrated Safety Analysis (ISA) Summary (Part I of the ISA Summary Chapters 1-8 and Part II Chapter 2.9-2.23)" are designated as "Proprietary" by Framatome in accordance with the document control system and policies established by Framatome for the control and protection of proprietary and confidential information.

3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as Framatome. Competition among these companies including Framatome is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The Integrated Safety Analysis (ISA) (Part I of the ISA Summary Chapters 1-8 and Part II Chapter 2.9-2.23) contains commercial information of a confidential nature that is not available in public sources or available to the public. Sections also contain information that is considered security sensitive in accordance with USNRC RIS 2005-31. This information contained in the

Integrated Safety Analysis (ISA) Summary is commercial and confidential because it:

- A. Reveals distinguishing aspects of Framatome's manufacturing processes by relating sequences of operations and/or sub-operations to optimize the efficiency and performance of manufacturing operations which a competitor within the field of nuclear fuel manufacturing may adapt for their own processes, reducing the competitor's expenditure of resources to achieve the same efficiencies, thereby gaining a competitive advantage to the disadvantage of Framatome.
- B. Reveals the use of process chemical additives for the enhancement of chemical processes which are believed to be unique in the industry both in terms of type and application, which if revealed to a competitor would provide for an unfair competitive advantage by reducing any expenditure by the competitor to develop and test the same concepts.
- C. Reveals aspects of privately funded development of process controls and parameters derived by Framatome over the course of optimizing the performance of waste treatment and other processes.
- D. Reveals technical rationale developed by Framatome relating to plant layout, structure, process flow and other technical information which a competitor could readily use without expenditure of funds and replicate in its facilities thereby gaining a competitive advantage to the disadvantage of Framatome.

5. Framatome Inc. will suffer considerable competitive harm if the contents of the license amendment package are made available to Framatome domestic and international competitors. Finally, this material cannot be

reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 20 day of January, 2025.

*Timothy J. Tate*

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Timothy J. Tate  
Manager, Environmental, Health, Safety and Licensing

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On this 20 day of January, 2025, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Timothy J. Tate to me known to be the Manager, Environmental, Health, Safety, and Licensing of Framatome Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.

*Sandra Mariscal*

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Sandra Mariscal  
Notary Public in and for the State of Washington,  
residing at Benton, Washington.  
My Commission Expires: 02/10/2027

