



Global Laser Enrichment LLC
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Docket: 70-7033

July 14, 2025

Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

RE: Global Laser Enrichment LLC. License Application Submittal – Revised Affidavit

REF: Submission of “Global Laser Enrichment PLEF License Application”, dated June 27, 2025

In accordance with Title 10 *Code of Federal Regulations* (CFR) Sections 70.5(a) *Communications*, and 70.21(h) *Filing*, Global Laser Enrichment LLC (GLE) submitted an application to possess and use special nuclear material in the Paducah Laser Enrichment Facility (PLEF). Subsequent discussions with NRC staff determined that the affidavit submitted with the reference, needed amendment to adequately describe the basis for withholding, and description of the harm that would result if the documents were not withheld from the public. The revised affidavit provides additional details of these aspects and should replace the affidavit included with the reference.

If there are any questions regarding this letter and its contents, please do not hesitate to contact me.

Sincerely,

Tim Knowles

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Licensing & Regulatory Affairs Manager

Cc: M. Murphy (GLE)
J. Rickman (GLE)

**AFFIDAVIT OF TIMOTHY KNOWLES, ON BEHALF OF GLOBAL LASER ENRICHMENT
(GLE), IN SUPPORT OF REQUEST FOR WITHHOLDING PROPRIETARY INFORMATION
UNDER 10 CFR 2.390**

I, Timothy Knowles, Licensing and Regulatory Affairs Manager of Global Laser Enrichment (GLE), make the following representations that to the best of my knowledge and belief:

1. I am authorized to execute this affidavit on behalf of Global Laser Enrichment LLC (GLE), and I have personal knowledge of the facts and circumstances set forth herein.
2. GLE seeks to have withheld from public disclosure, pursuant to 10 CFR 2.390(a)(4), and 10 CFR 2.390(b)(4)(v) the following documents submitted to the Nuclear Regulatory Commission (NRC) in connection with GLE's uranium enrichment facility licensing application:
 - Enclosure 1a – License Application Chapters 1 - 13
 - Enclosure 2 – Fundamental Nuclear Material Control Plan
 - Enclosure 4 – Emergency Plan
 - Enclosure 5a – Integrated Safety Analysis Summary (ISAS)
 - Enclosure 6 – Decommissioning Funding Plan (DFP)
 - Enclosure 7 – Financial Qualifications
 - Enclosure 8 – Nuclear Material Transportation Security Plan (NMTSP)
3. These documents contain sensitive commercial and financial information that is considered confidential and proprietary to GLE. The withheld information includes technical processes, facility design features, safety analyses, control strategies, financial methodologies, and operational strategies, the disclosure of which would likely cause substantial harm to GLE's competitive standing.
4. The information sought to be withheld is not available in public sources and has been held in confidence by GLE. GLE has taken appropriate measures to maintain the confidentiality of this information, including limiting access to employees and contractors with a specific "need to know."
5. Disclosure of this information would enable current and prospective competitors—particularly those in the process of preparing similar NRC uranium enrichment applications—to gain an unfair commercial advantage. The withheld materials reflect the results of substantial investments in terms of time, cost, and specialized technical know-how. Competitors could use this information to avoid similar development costs and shortcut complex analytical and regulatory workstreams, thereby reducing GLE's competitive edge and return on investment.
6. Of particular note, uranium enrichment is a highly competitive sector of the nuclear fuel cycle, and the NRC is currently reviewing or anticipating the submission of several enrichment facility applications. Public disclosure of GLE's proprietary information at this juncture would provide other market participants with an opportunity to extract regulatory, financial, and technical strategies from GLE's submittals, thereby distorting

the level playing field intended by the NRC's licensing process and undermining the commercial integrity of GLE's position.

7. The cumulative detail and strategic integration of the application materials render even those components commercially sensitive. Taken together, they could serve as a "roadmap" for other applicants, effectively allowing competitors to reverse-engineer or mirror GLE's submission strategy without incurring the same investment or technical rigor.
8. Due to the dynamic and highly competitive nature of current enrichment licensing activity, the requested withholding is also time sensitive. GLE respectfully requests that the NRC grant this exemption on an expedited basis and GLE agrees to revisit the scope of the requested withholdings at a mutually appropriate future date, once the risk of competitive harm has materially subsided or market conditions warrant reconsideration.
9. Redaction of the proprietary information would render the public versions of these documents devoid of substantive content and would be of no practical utility to the public or stakeholders. Accordingly, only Enclosure 1b – License Application Chapters 1 – 13, redacted version is being submitted.
10. The information that GLE requests to be withheld from public disclosure is contained in the entire document(s) as so marked.
11. The information stated in this affidavit has been submitted in accordance with the applicable parts of 10 CFR 2.390 and the guidance contained in NUREG-1556, Vol. 20, Appendix F.

I declare under penalty of perjury that the foregoing is true and correct.

Tim Knowles
Licensing & Regulatory Affairs Manager

07/14/2025
Date