



September 9, 2025
COR. # OE-25-0010

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Samuel Bazian, Senior Program Manager
Division of Security Operations
Office of Nuclear Security and Incident Response
Washington, DC 20555-0001

Orano USA LLC

4747 Bethesda Avenue
Suite 1001
Bethesda, MD 20814

Subject: Legal Succession of Areva by Orano for the Purpose
of the Treaty of Paris
(Docket #: 07007038, EPID #: L-2024-NEW-0007)

Dear Mr. Bazian:

Orano USA is submitting the enclosed Joint Understanding Concerning for the Legal Succession of Areva by Orano for the Purpose of the Treaty of Paris containing proprietary information to be withheld from public access. An affidavit is enclosed as required by 10 CFR 2.390 of the Commission's regulations for withholding this information.

Should the NRC staff require additional information, please do not hesitate to contact me at 336-420-8325, or by email at peter.vescovi@orano.group.

Sincerely,

DocuSigned by:


Peter Vescovi

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Peter Vescovi
Licensing Manager



Enclosures:

1. Joint Understanding Concerning for the Legal Succession of Areva by Orano for the Purpose of the Treaty of Paris (PROPRIETARY)
2. Affidavit Pursuant to 10 CFR 2.390

cc: Osiris Siurano Perez (NRC NMSS)
S. Bazian (NRC NSIR)
R. Ruppert (NRC NSIR)
Anne Haluska (Orano USA)

OE-25-0010 Enclosure 1

**Joint Understanding Concerning for the Legal Succession of Areva by Orano
for the Purpose of the Treaty of Paris**

Withhold Under 10 CFR 2.390

THE ORANO ENRICHMENT USA, LLC AFFIDAVIT PURSUANT
TO 10 CFR 2.390

State of Maryland:

County of **MONTGOMERY**:

I, Paul Tiao, depose and say that I am the Chief Legal Officer of Orano Enrichment USA, LLC (hereafter referred to as the "Company"), duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information requested to be withheld is contained in the document(s) listed below:

OE-25-0008 Enclosure 1 Joint Understanding Concerning for the Legal Succession of Areva by Orano for the Purpose of the Treaty of Paris (PROPRIETARY)

The information is clearly marked to indicate OPI 1 – RESTRICTED AND ORANO PROPRIETARY.

I have personal knowledge of the criteria and procedures utilized by the Company in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The Company implements an Orano Information Protection policy and procedure to keep our competitive advantage by protecting sensitive information.
- 2) The information requested to be withheld reveals cost or price information, production capacities, budget levels, or commercial strategies of the Company and its customers, investors, vendors, and employees, where unauthorized disclosure would be prejudicial to the Company's interest.
- 3) The information requested to be withheld reveals aspects of privately funded development plans or programs of commercial value to the submitter or owner of the information.

Further the deponent sayeth not.

Executed on: 9/11/2025

Signed by:

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Paul Tiao
Senior VP and Chief Legal Officer
Orano Enrichment USA LLC