9/18/2025



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

- I, Melinda Graham, Licensing Manager, Radiant Industries, LLC (Radiant) do hereby affirm and state:
 - 1. I am authorized to execute this affidavit on behalf of Radiant. 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 Radiant's request for proprietary treatment of certain commercial information submitted in Enclosure 2 to Radiant's letter dated 9/18/25 which provides white paper, "Categorical Exclusions for Microreactors".
 - 2. I have knowledge of the criteria used by Radiant 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 2 is owned by Radiant. 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 Radiant.
 - b. The information sought to be protected in Enclosure 2 is not available to the public.
 - c. The information contained in Enclosure 2 is of the type that is customarily held in confidence by Radiant. The information Radiant is requesting to be withheld from public disclosure includes technical information related to the design, analysis and operations associated with factor siting for manufacture and testing of our high-temperature, gascooled, advanced reactor design that directly impact our business development and commercialization efforts. Radiant limits access to this proprietary and confidential information in order to maintain confidentiality.
 - d. Enclosure 2 contains information about the planned activities of Radiant related to the factory siting and design development timeframes, and relates to the commercialization strategy for our advanced reactor. Public disclosure of the information contained in Enclosure 2 would create substantial harm to Radiant because it would reveal valuable technical information regarding Radiant's design 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.
 - e. The Proprietary Information contained in Enclosure 2 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 requesting withholding from public disclosure under 10 CFR 2.390.

I declare under the penalty of perjury that the foregoing is true and correct, executed on this 18th day of September 2025.

Sincerely,

Melinda Graham Licensing Manager, Radiant Industries, LLC