Docket No. 99902114
Docket Name: JAEA Floating Seismic Isolation System for SMRs

LR080412-01

Enclosure 2

Affidavit

I, Xing L. Yan, state as follows:

1. I am the Project Director for Nuclear Plant Innovation, Oarai Nuclear Engineering Institute of Japan Atomic Energy Agency (JAEA), as well the Manager of JAEA Floating Seismic Isolation System for SMRs Pre-application Engagement Project, and have been delegated the responsibility for reviewing the information described in Paragraph 2 to determine whether its withholding from public disclosure should be sought pursuant to the provisions of 10 CFR 2.390(a)(4).
2. The information sought to be withheld from public disclosure is contained in the Licensing Topic Report on Quality Assurance Program Description (QAPD) for Floating Seismic Isolation System (FSIS) Design Activities Supporting Application for a Standard Design Approval from the U.S. Nuclear Regulatory Commission (JAEA Document DR080302-1) and has been redacted in Enclosure 1.
3. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390(b)(1).
4. Pursuant to the provisions 10 CFR 2.390(b)(4), the following is furnished for consideration by the US NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
   (a) The information is owned and has been held in confidence by JAEA.
   (b) Its disclosure outside JAEA is limited to regulatory bodies, business partners, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
   (c) The information was transmitted to and received in confidence by the US NRC.
   (d) The information is not readily available in public.
   (e) Public disclosure of the information is likely to cause substantial harm to the competitive position of JAEA.
   (f) The information would customarily be held in confidence by JAEA, if it falls in one or more of several types below:
      (i) The information that reveals such aspects of a product (structure, system, component, etc.) or process (method, model, code, data, etc.) that its use secures JAEA a competitive position.
      (ii) The information that reveals such aspects of the technology or the process

that its use by any of JAEA's competitors without license from JAEA would substantially harm the competitive position of JAEA.

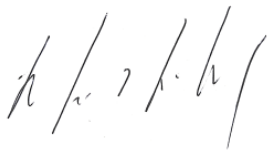
(iii) Its use by a competitor would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product or process.

(iv) The information that reveals cost or price information, production capacities, budget levels, or business strategies of JAEA, its partners, customers, or suppliers.

(v) The information that reveals aspects of past, present, or future JAEA or partner-funded development plans or programs of potential economic value to JAEA or its partners.

(vi) The information that contains patentable substance.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed by:  Date: April 12, 2026

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