

## A F F I D A V I T

1. My name is Morris Byram. I am Manager, Licensing & Regulatory Affairs for Framatome Inc. (Framatome) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3. I am familiar with the Framatome information contained in the NRC Draft Safety Evaluation for the ANP-10323, Revision 1, Supplement 1, Revision 1 topical report in enclosure 1 of Framatome Letter entitled "Response to Request for Comment on Draft Safety Evaluation for ANP-10323, Revision 1, Supplement 1P, Revision 0, 'One GALILEO Fuel Rod Thermal-Mechanical Methodology for Pressurized Water Reactors'," and referred to herein as "Document." Information contained in this Document has been classified by Framatome as proprietary in accordance with the policies established by Framatome for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by Framatome and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential. Public disclosure of this information is likely to harm the competitive position of Framatome because it would allow competitors to provide similar products without commensurate expense.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by Framatome to determine whether information should be classified as proprietary:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) whose use by any of Framatome's competitors, without a license from Framatome, would constitute a competitive economic disadvantage to Framatome.
- (b) The information consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), and the application of the data secures a competitive economic advantage.
- (c) Use of the information by a competitor would reduce the competitor's expenditure of resources, or improve its competitive position, in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
- (d) The information reveals cost or price information, production capacities, budget levels, or commercial strategies of Framatome or its customers or suppliers.
- (e) The information reveals aspects of privately funded development plans or programs of commercial value to Framatome or owner of the information.
- (f) The information consists of patentable ideas.

The information in this Document is considered proprietary for the reasons set forth in paragraph 6(a) and 6(c) above.

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

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

Executed on: April 29, 2026.

**BYRAM Morris** Digitally signed by BYRAM Morris  
Date: 2026.04.29 15:24:31 -07'00'

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