

**RESPONSE TO FREEDOM OF  
INFORMATION ACT (FOIA) REQUEST**

FOIA or Reference Number

FOIA-2026-000201

Response Number

1

Response  
Type☐

Interim

☒

Final

Requester:

Shaun Murrell

Date:

07/08/2026

**Description of Requested Records:**

Access to all financial and administrative records related to the Decommissioning Trust Funds, Escrow Accounts, and Standby Trust Agreements for the following facilities: Sequoyah Fuels Corporation (Gore, OK): NRC Docket No. 040-08027 / License No. SUB-1010; Dawn Mining Company (Ford, WA) [ continued Part I.D ]

**PART I. -- INFORMATION RELEASED**

- ☐ The NRC has made some, or all, of the requested records publicly available through one or more of the following means: (1) <https://www.nrc.gov> ; (2) public ADAMS, <https://www.nrc.gov/reading-rm/adams.html>; (3) microfiche available in the NRC Public Document Room; or the NRC Public Access Link (PAL), at <https://foia.nrc-gateway.gov/app/Home.aspx>.
- ☐ Agency records subject to the request are enclosed.
- ☐ Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (See Part I.D -- Comments) for a disclosure determination and direct response to you.
- ☐ We are continuing to process your request.
- ☒ See Part I.D -- Comments.

**PART I.A -- FEES**

AMOUNT

☐

You will be billed by NRC for the amount indicated.

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You will receive a refund for the amount indicated.

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Fees waived.

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Since the minimum fee threshold was not met, you will not be charged fees.

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Due to our delayed response, you will not be charged search and/or duplication fees that would otherwise be applicable to your request.

**PART I.B -- INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE**

- ☐ We did not locate any agency records responsive to your request. *Note:* Agencies may treat three discrete categories of law enforcement and national security records as not subject to the FOIA ("exclusions"). See 5 U.S.C. 552(c). This is a standard notification given to all requesters; it should not be taken to mean that any excluded records do, or do not, exist.
- ☒ We have withheld certain information pursuant to the FOIA exemptions described, and for the reasons stated, in Part II.
- ☐ Because this is an interim response to your request, you may not appeal at this time. We will notify you of your right to appeal any of the responses we have issued in response to your request when we issue our final determination.
- ☒ You may appeal this final determination within 90 calendar days of the date of this response. If you submit an appeal by mail, address it to the FOIA Officer, at U.S. Nuclear Regulatory Commission, Mail Stop T-6 A60M, Washington, D.C. 20555-0001. You may submit an appeal by email to [FOIA.resource@nrc.gov](mailto:FOIA.resource@nrc.gov). You may fax an appeal to (301) 415-5130. Please be sure to include on your submission that it is a "FOIA Appeal." You may file an appeal through the NRC Public Access Link (PAL) at <https://foia.nrc-gateway.gov/app/Home.aspx>.

**PART I.C -- REFERENCES AND POINTS OF CONTACT**

You have the right to seek assistance from the NRC's FOIA Public Liaison by submitting your inquiry at <https://www.nrc.gov/reading-rm/foia/contact-foia.html>, or by calling the FOIA Public Liaison at (301) 415-0717.

If we have denied your request, you have the right to seek dispute resolution services from the NRC's Public Liaison or the Office of Government Information Services (OGIS). To seek dispute resolution services from OGIS, you may email OGIS at [ogis@nara.gov](mailto:ogis@nara.gov), send a fax to (202) 741-5789, or send a letter to: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740-6001. For additional information about OGIS, please visit the OGIS website at <https://www.archives.gov/ogis>.



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**PART I.D -- COMMENTS**

[continued Description of Requested Records] NRC/State Docket No. WN-1042-2. You requested these documents from 2021 to the present [ date of request: January 20, 2026 ], to include: Trustee Identification, copies of the Trust Agreements or Amendments identifying all current Successor Trustees or Delegated Distributing Authorities (DDA); Ledger of Distributions, a complete list of all disbursements, payments, or "administrative expenses" paid out from these trust accounts to any third-party research firm or individuals; Financial Assurance Updates, the most recent annual or triennial Decommissioning Funding Status (DFS) Reports submitted to the NRC; and, Identity of "Third-Party Researchers", any correspondence or contracts between the NRC/Licensee and third-party firms authorized to conduct "financial research" or "human Behavioral studies" on or near these sites.

The NRC received your FOIA request on January 21, 2026. We tasked the Office of Nuclear Material Safety and Safeguards (NMSS) and the Office of Nuclear Reactor Regulation (NRR) to search for records.

Responsive records to your request originated from Sequoyah Fuels Corporation (SFC); therefore, we consulted with SFC to determine any equities it may hold in the materials. After considering the disclosure recommendations provided by NMSS staff, together with SFC's views, this office has determined that the records are appropriate for partial release. The specific exemptions supporting redactions in this determination are set forth in Part II, enclosed. Additionally, no records associated with Dawn Mining were located.

This completes the processing of your FOIA request.

Signature - Freedom of Information Act Officer or Designee

**Alecia S. Sillah**

Digitally signed by Alecia S. Sillah  
Date: 2026.07.08 06:43:29 -04'00'

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**PART II.A -- APPLICABLE EXEMPTIONS**

Records subject to the request are being withheld in their entirety or in part under the FOIA exemption(s) as indicated below (5 U.S.C. 552(b)), after taking into consideration the foreseeable harm standard when reviewing records and applying these FOIA exemptions.

- ☐ Exemption 1: The withheld information is properly classified pursuant to an Executive Order protecting national security information.
- ☐ Exemption 2: The withheld information relates solely to the internal personnel rules and practices of NRC.
- ☐ Exemption 3: The withheld information is specifically exempted from public disclosure by the statute indicated.
- ☐ Sections 141-145 of the Atomic Energy Act, which prohibits the disclosure of Restricted Data or Formerly Restricted Data (42 U.S.C. 2161-2165).
- ☐ Section 147 of the Atomic Energy Act, which prohibits the disclosure of Unclassified Safeguards Information (42 U.S.C. 2167).
- ☐ 41 U.S.C. 4702(b), which prohibits the disclosure of contractor proposals, except when incorporated into the contract between the agency and the submitter of the proposal.
- ☐ Other:
- ☒ Exemption 4: The withheld information is a trade secret or confidential commercial or financial information that is being withheld for the reason(s) indicated.
- ☐ The information is considered to be proprietary because it concerns a licensee's or applicant's physical protection or material control and accounting program for special nuclear material pursuant to 10 CFR 2.390(d)(1).
- ☒ The information is considered to be another type of confidential business (proprietary) information.
- ☐ The information was submitted by a foreign source and received in confidence pursuant to 10 CFR 2.390(d)(2).
- ☐ Exemption 5: The withheld information consists of interagency or intraagency records that are normally privileged in civil litigation.
- ☐ None of the information being withheld under Exemption 5/Deliberative Process Privilege is appropriate for discretionary disclosure.
- ☐ Attorney work product privilege.
- ☐ Attorney-client privilege.
- ☐ Exemption 6: The withheld information from a personnel, medical, or similar file, is exempted from public disclosure because its disclosure would result in a clearly unwarranted invasion of personal privacy.
- ☐ Exemption 7: The withheld information consists of records compiled for law enforcement purposes and is being withheld for the reason(s) indicated.
- ☐ (A) Disclosure could reasonably be expected to interfere with an open enforcement proceeding.
- ☐ (C) Disclosure could reasonably be expected to constitute an unwarranted invasion of personal privacy.
- ☐ (D) The information consists of names and other information the disclosure of which could reasonably be expected to reveal identities of confidential sources.
- ☐ (E) Disclosure would reveal techniques and procedures for law enforcement investigations or prosecutions, or guidelines that could reasonably be expected to risk circumvention of the law.
- ☐ (F) Disclosure could reasonably be expected to endanger the life or physical safety of any individual.
- ☐ Other:

**PART II.B -- DENYING OFFICIALS**

In accordance with 10 CFR 9.25(g) and 9.25(h) of the U.S. Nuclear Regulatory Commission regulations, the official(s) listed below have made the determination to withhold certain information responsive to your request.

| DENYING OFFICIAL | TITLE/OFFICE                            | INFORMATION DENIED                             | APPELLATE OFFICIAL                  |                          |                          |
|------------------|-----------------------------------------|------------------------------------------------|-------------------------------------|--------------------------|--------------------------|
|                  |                                         |                                                | EDO                                 | SECY                     | OIG                      |
| A. Sillah        | FOIA Officer                            | Commercial Financial and Proprietary Documents | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|                  | Select Title/Office from drop-down list |                                                | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
|                  | Select Title/Office from drop-down list |                                                | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
|                  | Select Title/Office from drop-down list |                                                | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |

April 19, 2023

~~CONFIDENTIAL~~

US Nuclear Regulatory Commission (NRC)  
Douglas Mandeville, Senior Project Manager  
Mailstop T-5 A-10  
Washington, DC 20555-0001

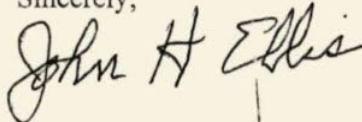
RE: License No. SUB-1010; Docket No. 40-8027  
2022 SFIC Financial Statements

Dear Mr. Mandeville:

Please find enclosed the 2022 financial statements for Sequoyah Fuels International Corporation (SFIC) submitted in accordance with paragraph 5 of the Funding Settlement Agreement between Sequoyah Fuels Corporation (SFC) and the NRC dated August 18, 1995.

Sequoyah Fuels Corporation (SFC) requests that this information be treated as proprietary information under the provisions of 10 CFR 2.790. This request is supported by the attached affidavit, which shows that SFIC is a privately held corporation and the enclosed financial statement contains sensitive financial information. Should you have any questions concerning this information, please contact me at 918-489-5511, extension 226.

Sincerely,



John H Ellis, President  
Sequoyah Fuels Corporation

JHE/bt

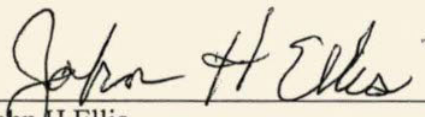
Enclosures

Affidavit of  
JOHN H. ELLIS

I, John H Ellis, President of Sequoyah Fuels Corporation, do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of Sequoyah Fuels International Corporation.
2. The affiant is an officer of the Licensee, Sequoyah Fuels Corporation, which is a wholly-owned subsidiary of Sequoyah Fuels International Corporation, which is a wholly-owned subsidiary of Sequoyah Holding Corporation.
3. This affidavit is submitted under the provisions of 10 CFR 2.790 in order to support a request for withholding the enclosed financial statements of Sequoyah Fuels International Corporation from disclosure or publication.

The subject documents constitute confidential financial information of privately-held corporations which have been held in confidence by the owner and are customarily held in such confidence. These documents have been transmitted to the Commission in confidence, and are not available in public sources. Public disclosure would create substantial harm to the owner by providing detailed financial information to its competitors and other parties whose interest may be adverse to the owner.

  
\_\_\_\_\_  
John H Ellis  
President, Sequoyah Fuels Corporation

SUBSCRIBED AND SWORN to before me this 19<sup>th</sup> day of APRIL, 2023

  
\_\_\_\_\_  
Notary Public

My commission expires:

June 30, 2023

