



November 9, 2023

Docket No: 99902098

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Transmittal of GA-EMS Fast Modular Reactor Source Term Methodology

General Atomics - Electromagnetic Systems (GA-EMS) is submitting to the Nuclear Regulatory Commission (NRC) the Fast Modular Reactor (FMR) Source Term Methodology for pre-application license review. The white paper in Enclosure 2 contains proprietary information. A non-proprietary version of the white paper in which the proprietary information has been redacted is provided in Enclosure 3.

This activity is in support of the DOE award for the cost-share agreement DE-NE0009052 under the Advanced Reactor Concepts – 20 (ARC-20) program. GA-EMS requests that the NRC review and provide feedback on the acceptance of the proposed Source Term Methodology within 90 days of receipt of this letter. Additional interactions to respond to NRC requests for additional information on the technical report is anticipated to take 6 months with an NRC staff effort of around 300 hours. A meeting between GA-EMS and NRC staff can be scheduled to address any early questions and feedback on this pre-application license submittal.

If you have any questions or need any additional information, please contact John Bolin by email at [john.bolin@ga.com](mailto:john.bolin@ga.com) or by phone at 858-762-7576.

Sincerely,

A handwritten signature in black ink, appearing to read "John Bolin".

John Bolin  
Nuclear Technologies and Materials Division  
General Atomics – Electromagnetic Systems

Enclosures:

1. Affidavit supporting request for withholding from public disclosure (10 CFR 2.390).
2. "Fast Modular Reactor Source Term Methodology," 30599T00038 Rev. 2, October 31, 2023 (Proprietary).
3. "Fast Modular Reactor Source Term Methodology," 30599T00038 Rev. 2, October 4, 2023 (Non-proprietary).

cc: [Samuel.CuadradoDeJesus@nrc.gov](mailto:Samuel.CuadradoDeJesus@nrc.gov)  
[William.Jessup@nrc.gov](mailto:William.Jessup@nrc.gov)

**Enclosure 1**  
**General Atomics Affidavit and**  
**Request for Withholding from Public Disclosure (10 CFR 2.390)**

I, *Aaron Majors*, hereby state:

1. I am the program manager for the Fast Modular Reactor at General Atomics (GA), and have been authorized by GA to review information sought to be withheld from public disclosure in connection with the development, testing, licensing, and deployment of the Fast Modular Reactor, and to apply for its withholding from public disclosure on behalf of GA.
2. I am requesting the proprietary portions of GA-EMS' Enclosure 2 be withheld from public disclosure under 10 CFR 2.390.
3. I am making this request for withholding, and executing this affidavit in support thereof, pursuant to the provisions of 10 CFR 2.390(b)(1).
4. I have personal knowledge of the criteria and procedures utilized by GA in designating information as trades secret, private data, or confidential information. Some examples of information that GA considers proprietary and eligible for withholding under 10 CFR 2.390(a)(4) include:
  - a. Information important to the conduct of business or the creation of products and is kept secret.
  - b. Information primarily of a technical nature such as formulas, computer codes, techniques or process whose economic value depends solely on their secrecy.
  - c. Information of a business nature such as wages, salaries, planning information and other information which is in a preliminary or tentative stage of development.
  - d. Technical and business information, rates and prices which GA treats as confidential.
  - e. Information produced or developed by a GA employee having value to GA.
5. GA information contained in Enclosure 2 to this letter contains technical information such as formulas, computer codes, techniques and processes which could provide a competitor with a commercial advantage if the information were to be revealed.
6. Pursuant to 10 CFR 2.390(b)(4), the following is furnished for consideration by the Commission 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 is owned and has been held in confidence by GA.
  - b. The information is of a type customarily held in confidence by GA and not customarily disclosed to the public.
  - c. The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR 2.390, it is to be received in confidence by the Commission.
  - d. The information is not readily available in public sources.

- e. The information, if available to a competitor, would reduce their expenditure of resources and improve their competitive position.

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

Executed on: October 6<sup>th</sup>, 2023

A handwritten signature in black ink, appearing to read 'A. Majors', with a long horizontal flourish extending to the right.

Aaron Majors, Program Manager  
GA-EMS Fast Modular Reactor Project