



TRISO-X, LLC
151 Lafayette Drive, Suite 300
Oak Ridge, TN 37830

TX0-REG-LTR-0050

~~THE ENCLOSURES TO THIS LETTER CONTAIN SECURITY RELATED, EXPORT
CONTROLLED, AND PROPRIETARY / FINANCIAL INFORMATION - WITHHOLD IN
ACCORDANCE WITH 10 CFR 2.390~~

ELECTRONIC DELIVERY

December 30, 2024

Director, Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

- References:
- 1) Docket No. 70-7027
 - 2) TRISO-X letter to NRC, "TRISO-X Fuel Fabrication Facility License Application Submittal," dated April 5, 2022, ADAMS Accession No. ML22101A205
 - 3) NRC Letter from Matthew Bartlett, Senior Project Manager, Fuel Facility Licensing Branch, to Jennifer Wheeler, Director, Regulatory Affairs, "Acceptance of the TRISO-X, LLC License Application for a Fuel Fabrication Facility (Enterprise Project Identification Number L-2022-NEW-0005 and L-2022-LNE-0002)," dated November 18, 2022
 - 4) TRISO-X letter to NRC, "Project Update Letter Regarding the TRISO-X License Application," dated January 20, 2024, ADAMS Accession No. ML24020A010

Subject: **Supplemental Information for the TRISO-X Fuel Fabrication Facility License Application Review (Part 1)**

TRISO-X, LLC (TRISO-X) hereby submits supplemental information regarding the review of the License Application for the TRISO-X Fuel Fabrication Facility (Reference 2). The enclosed License Application document revisions incorporate previously submitted responses to NRC Requests for Additional Information, as well as project updates that were summarized in a letter dated January 20, 2024 (Reference 4). The remainder of the License Application documents will be submitted at a later date, as discussed with your staff.

Request for Withholding

Portions of the enclosed submittal contain information that TRISO-X requests be withheld from public disclosure. The following regulations and guidance were consulted to develop the

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document markings and specific withholding requests as noted in the description of each enclosure's contents.

- 10 CFR 2.390, *Public inspections, exemptions, requests for withholding*
- 10 CFR 110, *Export and Import of Nuclear Equipment and Material*, and other related
- regulations 10 CFR 810 and 15 CFR 730-774
- NRC Regulatory Issue Summary 2005-31, Revision 1, *Control of Security-Related Sensitive Unclassified Non-Safeguards Information Handled by Individuals, Firms, and Entities Subject to NRC Regulation of the Use of Source, Byproduct, and Special Nuclear Material*

Summary of this Submittal

The following documents are included with this letter.

Enclosure 1 – Affidavit, as required by 10 CFR 2.390(b) to support TRISO-X requests to withhold the below-mentioned proprietary / financial information.

Enclosure 2 – License Application Chapters 1-13, revision numbers as indicated in Chapter Index (Non-Proprietary).

Enclosure 3 – Sensitive Addendum includes sensitive information pertaining to License Chapter 1 that is considered ***Security-Related*** and ***Proprietary***. The sensitive information has been moved from Enclosure 2 to a separately marked "Sensitive Addendum" that TRISO-X requests be withheld from public disclosure per 10 CFR 2.390(a)(4) and NRC RIS 2005-31.

Enclosure 4 – Fundamental Nuclear Material Control Plan, Revision 2 contains information that is considered ***Security-Related***, ***Export Controlled***, and ***Proprietary***, and TRISO-X requests that this document be withheld from public disclosure per 10 CFR 2.390(a)(4), 10 CFR 110, and NRC RIS 2005-31.

Enclosure 5 – Site Emergency Plan, Revision 2 contains information that is considered ***Security-Related*** and ***Proprietary***, and TRISO-X requests that this document be withheld from public disclosure per 10 CFR 2.390(a)(4) and NRC RIS 2005-31.

Enclosure 6 – Decommissioning Funding Plan, Revision 2 contains information that is considered ***Proprietary*** and ***Financial***, and TRISO-X requests that this document be withheld from public disclosure per 10 CFR 2.390(a)(4).

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If there are questions or if additional information is required, please contact me at (865) 850-0893 or jwheeler@triso-x.com.

Sincerely,

Jennifer Wheeler

Jennifer K. Wheeler, P.E.
Vice President, Regulatory Affairs

TRISO-X, LLC
151 Lafayette Drive, Suite 300
Oak Ridge, TN 37830

Copy: Mr. Matthew Bartlett, US NRC, NMSS
TRISO-X Regulatory Records File

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ENCLOSURE 1

AFFIDAVIT

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**AFFIDAVIT
PROPRIETARY / FINANCIAL INFORMATION**

I, Jennifer K. Wheeler, Vice President of Regulatory Affairs for TRISO-X, LLC, (TRISO-X) that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following documents which TRISO-X requests to have withheld from public disclosure pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 2.390 are:
- Enclosure 3 – Sensitive Addendum
 - Enclosure 4 – Fundamental Nuclear Material Control Plan
 - Enclosure 5 – Site Emergency Plan
 - Enclosure 6 – Decommissioning Funding Plan
- B. The information contained in the document(s) cited in A above has been held in confidence by TRISO-X, in that it contains financial information as defined in 10 CFR 2.390(a) that is not customarily disclosed to the public.
- C. The information contained in the document(s) cited in A above has been held in confidence by TRISO-X, in that it contains trade secrets or commercial information as defined in 10 CFR 2.390(a) that is not customarily disclosed to the public.
- D. The public disclosure of the information contained in the document(s) cited in A above would likely cause substantial economic harm to the competitive advantage held by TRISO-X because it contains distinguishing aspects of a process, methodology, or components which provide a competitive advantage in product optimization or marketability.
- E. Unrestricted disclosure of the information contained in the document(s) cited in A above would jeopardize the position of TRISO-X in the market and, thereby give a market advantage to any competitors who would benefit from access to substantial TRISO-X sensitive information related to the company's nuclear fuel manufacturing methods.
- F. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial harm to the competitive position of TRISO-X because it would enhance the ability of competitors to address similar safety, regulatory and licensing issues without commensurate expenses.
- G. The information that TRISO-X requests to be withheld from public disclosure is contained in the entire document(s) as so marked. Non-proprietary versions of the documents would essentially be blank pages and are therefore not provided.


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Therefore, TRISO-X requests the versions of the submitted information marked as proprietary / financial be withheld from the public disclosure pursuant to 10 CFR 2.390(b) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

The averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief:



12/30/2024

Jennifer K. Wheeler

Date

Vice President, Regulatory Affairs
TRISO-X, LLC

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