



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

**Global Nuclear Fuel**

Kevin C. Walsh  
Chief Executive Officer  
Global Nuclear Fuel, LLC

3901 Castle Hayne Road – M/C J20  
Wilmington, NC 28402  
USA

T 910 819-6987  
F 910 362-6987

[Kevin.Walsh@ge.com](mailto:Kevin.Walsh@ge.com)

**Proprietary Information Notice**

*This letter forwards GNF-A proprietary information which is to be withheld in accordance with 10CFR2.390.*

August 15, 2011

U.S. Nuclear Regulatory Commission  
Director, Office of Nuclear Material Safety and Safeguards  
11555 Rockville Pike  
Rockville, MD 20852

Subject: Letter from Chief Executive Officer of Global Nuclear Fuel, LLC in support of General Electric Company Parent – Guarantee of Funds for Decommissioning.

Reference: SNM-1097 Docket No. 70-1113

I am the Chief Executive Officer of Global Nuclear Fuel, LLC (GNF) and Chairman of the Governing Board of Global Nuclear Fuel-Americas, LLC (GNF-A). This letter is in support of Global Nuclear Fuel-Americas, LLC use of the financial test to demonstrate financial assurance for SNM-1097 as specified in 10 CFR Part 70.

I hereby certify that, GNF-A is currently a going concern and as of December 31, 2010 it possessed a positive tangible net worth in the amount of [REDACTED]

This company is not required to file a Form 10-K with the U.S. Securities and Exchange Commission. The fiscal year end of GNF-A ends on December 31.

I hereby certify that the contents of this letter are true and correct to the best of my knowledge.

Yours sincerely,

Kevin C. Walsh  
Chief Executive Officer  
Global Nuclear Fuel, LLC  
Chairman of the Governing Board, GNF-A

Attachment: Affidavit

Attachment 2

**Global Nuclear Fuel-Americas, LLC**

**AFFIDAVIT**

I, **Scott P. Murray**, state as follows:

- (1) I am the Manager, Licensing and Liabilities, of GE-Hitachi Nuclear Energy Americas LLC (GEH), and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld is contained in GNF's letter entitled, Kevin C. Walsh to U.S. Nuclear Regulatory Commission entitled Letter from Chief Executive Officer of Global Nuclear Fuel, LLC in support of General Electric Company Parent – Guarantee of Funds for Decommissioning. GNF-A text proprietary information in GNF-A's letter, is identified by the statement "GNF-A Proprietary"
- (3) In making this application for withholding of proprietary information of which it is the owner or licensee, GNF-A relies upon the exemption from disclosure set forth in the Freedom of Information Act (FOIA), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), and 2.390(a)(4) for trade secrets (Exemption 4). The material for which exemption from disclosure is here sought also qualifies under the narrower definition of trade secret, within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975 F2d 871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704 F2d 1280 (DC Cir. 1983).
- (4) The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (4)a. and (4)b. Some examples of categories of information that fit into the definition of proprietary information are:
  - a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by GNF-A's competitors without license from GNF-A constitutes a competitive economic advantage over GNF-A and/or other companies.
  - b. Information that, if used 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.
- (5) To address 10 CFR 2.390(b)(4), the information sought to be withheld is being submitted to the NRC in confidence. The information is of a sort customarily held in confidence by GNF-A, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GNF-A, not been disclosed publicly, and not been made available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary and/or confidentiality agreements that provide for maintaining the information in confidence. The initial designation of this information as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure are as set forth in the following paragraphs (6) and (7).
- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, who is the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge, or who is the person most likely to be subject to the terms under which it was licensed to GNF-A. Access to such documents within GNF-A is limited to a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist, or other equivalent authority for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GNF-A are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate

need for the information, and then only in accordance with appropriate regulatory provisions or proprietary and/or confidentiality agreements.


- (8) The information identified in paragraph (2) above is classified as proprietary because it contains details of GNF-A's finances, processes, design and manufacturing facilities.
- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GNF-A's competitive position and foreclose or reduce the availability of profit-making opportunities. The facility design and licensing methodology is part of GNF-A's comprehensive safety and technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GNF-A. The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial. GNF-A's competitive advantage will be lost if its competitors are able to use the results of the GNF-A experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to GNF-A would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive GNF-A of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing and obtaining these very valuable analytical tools.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.

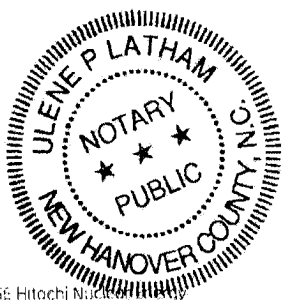
Executed on this 15<sup>th</sup> day of August, 2011.

  
Scott P. Murray

Scott P. Murray  
GE Hitachi Nuclear Energy Americas LLC

STATE OF NORTH CAROLINA           )  
COUNTY OF NEW HANOVER         )

Subscribed and sworn to me, a Notary Public, in and for the State of North Carolina, this 15th day of August, 2011.



Wesley P. Lathan  
Notary Public in and for the  
State of North Carolina

My Commission Expires: June 23, 2013

**Proprietary Information Notice**

This attachment forwards GNF-A Proprietary information which is to be withheld from public disclosure in accordance with 10CFR2.390 and RIS 2005-31.

Attachment 3

2010 to 2011 Cost Estimate Changes						
			2011 Current	2010		
			Cost Estimate	Cost Estimate		
Facility		License	2011	2010	Change	Comments
GNF-A Wilmington	NC	SNM-1097	175,800,000	168,200,000	7,600,000	[REDACTED]
VBWR	CA	DPR-1	9,200,000	8,900,000	300,000	
NTR	CA	R-33	4,100,000	4,000,000	100,000	
GETR	CA	TR-1	17,700,000	17,100,000	600,000	
EVSR	CA	DR-10	13,000,000	13,900,000	(900,000)	
SNM-960	CA	SNM-960	37,400,000	36,400,000	1,000,000	
Morris	IL	SNM-2500	79,600,000	78,600,000	1,000,000	

(1) Shared services includes NRC fees, ORISE and NRC review of final site survey, insurance and utility costs.

## Global Nuclear Fuel-Americas, LLC

### AFFIDAVIT

I, **Scott P. Murray**, state as follows:

- (1) I am the Manager, Licensing and Liabilities, of GE-Hitachi Nuclear Energy Americas LLC (GEH), and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld is contained in GNF's Attachment 3, 2010 to 2011 Cost Estimate changes. GNF-A text proprietary information in GNF-A's letter, is identified by the statement "GNF-A Proprietary"
- (3) In making this application for withholding of proprietary information of which it is the owner or licensee, GNF-A relies upon the exemption from disclosure set forth in the Freedom of Information Act (FOIA), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), and 2.390(a)(4) for trade secrets (Exemption 4). The material for which exemption from disclosure is here sought also qualifies under the narrower definition of trade secret, within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975 F2d 871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704 F2d 1280 (DC Cir. 1983).
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I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.

Executed on this 15<sup>th</sup> day of August, 2011.

  
Scott P. Murray

Scott P. Murray

GE Hitachi Nuclear Energy Americas LLC

STATE OF NORTH CAROLINA )  
COUNTY OF NEW HANOVER )

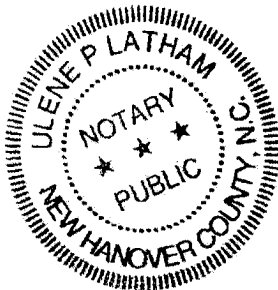
Subscribed and sworn to me, a Notary Public, in and for the State of North Carolina, this 15th day of August, 2011.

Wm B. Latham

Notary Public in and for the  
State of North Carolina

My Commission Expires: \_\_\_\_\_

June 23, 2013





**HITACHI**

GE Hitachi Nuclear Energy

Caroline Reda  
President & CEO

3901 Castle Hayne Road  
P.O. Box 780  
Wilmington, NC 28402  
USA  
T 910-819-3900

**~~Security-Related~~ Information Notice**

*The attachment to this letter contains and forwards security-related sensitive information which is to be withheld from public disclosure in accordance with 10CFR2.390 and RIS 2005-31.*

August 15, 2011

U.S. Nuclear Regulatory Commission  
Director, Office of Nuclear Material Safety and Safeguards  
11555 Rockville Pike  
Rockville, MD 20852

U.S. Nuclear Regulatory Commission  
Director, Office of Nuclear Reactor Regulation  
11555 Rockville Pike  
Rockville, MD 20852

Subject: Certification of Financial Assurance for GE-Hitachi Nuclear Energy Americas LLC

Reference: Dockets 50-18, 50-73, 50-70, 50-183, 70-754 and 72-1

I certify that GE-Hitachi Nuclear Energy Americas LLC (GEH) is licensed by the NRC to possess the types of materials under 10 CFR 50, 70 & 72 in the amounts designated in Attachment (1).

I also certify that financial assurance in the amount of \$161,000,000 has been obtained on behalf of GE-Hitachi Nuclear Energy Americas LLC for the purpose of decommissioning as prescribed by 10 CFR Part 50, 70 and 72.

Yours sincerely,

Caroline Reda  
President & CEO  
GE-Hitachi Nuclear Energy

Attachment (1): Type and amount of material authorized by each license.

~~Security-Related Information - Withhold from Public Disclosure per 10CFR 2.390~~

Attachment 4

Name of Facility	License Number	Location of Facility	Possession Limits	Current Cost Estimate
GE-Hitachi Nuclear Energy Americas, LLC Vallecitos Nuclear Center	DPR-1 Docket 50-18	Vallecitos Nuclear Center 6705 Vallecitos Rd. Pleasanton, CA 94566	[REDACTED]	\$ 9,200,000
GE-Hitachi Nuclear Energy Americas, LLC Vallecitos Nuclear Center	R-33 Docket 50-73	Vallecitos Nuclear Center 6705 Vallecitos Rd. Pleasanton, CA 94566		\$ 4,100,000
GE-Hitachi Nuclear Energy Americas, LLC Vallecitos Nuclear Center	TR- 1 Docket 50-70	Vallecitos Nuclear Center 6705 Vallecitos Rd. Pleasanton, CA 94566		\$ 17,700,000
GE-Hitachi Nuclear Energy Americas, LLC Vallecitos Nuclear Center	DR- 10 Docket 50-183	Vallecitos Nuclear Center 6705 Vallecitos Rd. Pleasanton, CA 94566		\$ 13,000,000
GE-Hitachi Nuclear Energy Americas, LLC Vallecitos Nuclear Center	SNM-960 Docket 70-754	Vallecitos Nuclear Center 6705 Vallecitos Rd. Pleasanton, CA 94566		\$ 37,400,000
GE-Hitachi Nuclear Energy Americas, LLC Morris Operation	SNM-2500 Docket 72-1	Morris Operation 7555 East Collins Rd. Morris, IL 60450		\$ 79,600,000
			Total	\$161,000,000





**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

Kevin C. Walsh  
Chief Executive Officer  
Global Nuclear Fuel, LLC

3901 Castle Hayne Road - M/C J20  
Wilmington, NC 28402  
USA

T 910 819-6987  
F 910 362-6987

***Security-Related Information Notice***

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August 15, 2011

U.S. Nuclear Regulatory Commission  
Director, Office of Nuclear Material Safety and Safeguards  
11555 Rockville Pike  
Rockville, MD 20852

Subject: Certification of Financial Assurance for Global Nuclear Fuel-Americas, LLC

Reference: SNM-1097, Docket 70-1113

I am the Chief Executive Officer of Global Nuclear Fuel, LLC (GNF) and Chairman of the Governing Board of Global Nuclear Fuel-Americas, LLC (GNF-A). This letter is Global Nuclear Fuel-Americas, LLC certification of financial assurance for SNM-1097 as specified in 10 CFR Part 70.

I certify that Global Nuclear Fuel-Americas, LLC is licensed by the NRC to possess the types of materials under 10 CFR 70 in the amounts designated in Attachment (1).

I also certify that financial assurance in the amount of \$175,800,000 has been obtained on behalf of Global Nuclear Fuel -Americas LLC for the purpose of decommissioning as prescribed by 10 CFR Part 70.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kevin C. Walsh', is written over a horizontal line.

Kevin C. Walsh  
Chief Executive Officer  
Global Nuclear Fuel, LLC  
Chairman of the Governing Board, GNF-A

Attachment (1): Type and amount of material authorized by SNM-1097.

~~Security-Related Information - Withhold from Public Disclosure per 10CFR 2.390~~

Attachment 5

Name of Facility	License Number	Location of Facility	Possession Limits	Current Cost Estimate
Global Nuclear Fuel-Americas, LLC Wilmington Fuel Manufacturing Facility	SNM-1097  Docket 70-1113	3901 Castle Hayne Rd. Wilmington, NC 28401	[REDACTED]	\$175,800,000
			Total	\$175,800,000



GE Energy  
Reuter-Stokes, Inc.

8499 DARROW RD  
TWINSBURG, OH 44087  
USA

T 330 425 3755

~~Security-Related~~ Information Notice

*This letter contains and forwards  
security-related information which is to be  
withheld from public disclosure in  
accordance with 10CFR2.390 and RIS  
2005-31.*

August 8, 2011

U. S. NRC  
Director, Office of Nuclear Material Safety and Safeguards  
11555 Rockville Pike  
Rockville, MD  
20852

Subject: Certification of Financial Assurance for Reuter-Stokes, Inc. License SNM 1826  
Docket 070-02872

I certify that Reuter-Stokes, Inc. is licensed by the NRC to possess the following types of  
unsealed byproduct material with a half-life greater than 120 days licensed under 10 CFR  
Part 30 and unsealed special nuclear material licensed under 10 CFR Part 70 in  
the following amounts:

<u>Type of Material</u>	<u>Amount of Material</u>
-------------------------	---------------------------

[REDACTED]

[REDACTED]

I also certify that financial assurance in the amount of \$1,700,000 has been obtained for the  
purpose of decommissioning as prescribed by 10 CFR Part 30 and 70.

A handwritten signature in black ink, appearing to read 'Leo VanderSchoor'.

Leo VanderSchoor  
President & CEO  
Reuter-Stokes, Inc.