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July 31, 2018

XE00-R-R1-RD-L_000126

Project No. 00000818

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

Subject: REGULATORY ENGAGEMENT PLAN FOR X-ENERGY'S Xe-100 REACTOR

Ladies and Gentlemen,

The purpose of this letter is to voluntarily submit a Regulatory Engagement Plan (REP) on behalf of X Energy, LLC ("X-energy"). This submission provides additional information to prior X-energy submittals for Regulatory Issue Summary (RIS) 2017-08 (response dated January 16, 2018), RIS 2015-07 (response dated November 23, 2015), and RIS 2013-18 (response dated March 28, 2014).

X-energy's REP contains commercially sensitive, proprietary information and, as such, we are requesting that this information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, request for withholding," paragraph (a)(4). Since Commercially Proprietary Information constitutes much of the reply herein, a public version is not being submitted. Accordingly, Enclosure 1 is the Non-Public version of X-energy's REP which contains non-redacted sensitive information. This proprietary information is appropriately marked and an affidavit providing the basis for this request is provided in Enclosure 2.

Sincerely,

Harlan Bowers

President
X Energy, LLC



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Cc:

X Energy, LLC.

Kim Lester

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Nuclear Regulatory Commission

Amy Cubbage

John Monninger

Kevin Coyne

John Segala

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Fred Brown

Enclosures: 1) Regulatory Engagement Plan (REP)
 2) Affidavit



I, Harlan Bowers, President of X-Energy, LLC (X-energy) do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of X-energy. I am further authorized to review information submitted to or discussed with the Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure. The purpose of this affidavit is to provide the information required by 10 CFR 2.390(b) in support of X-energy's request for proprietary treatment of certain commercial information submitted in enclosure 1 to X-energy's letter XE00-R-R1-RD-L_000126 from myself to the NRC which provides the Regulatory Engagement Plan (REP) for X Energy, LLC's Xe-100 Reactor through Conceptual Design.
2. I have knowledge of the criteria used by X-energy in designating information as sensitive, proprietary, or confidential.
3. Pursuant to the provision of paragraph (b)(4) of 10 CFR 2.390, the following is furnished for consideration by the NRC 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 in Enclosure 1 is owned by X-energy. This information was prepared with the explicit understanding that the information itself would be treated as proprietary and confidential and has been held in confidence by X-energy.
 - b. The information sought to be protected in Enclosure 1 is not available to the public.
 - c. The information contained in Enclosure 1 is of the type that is customarily held in confidence by X-energy, and there is a rational basis for doing so. The information X-energy is requesting to be withheld from public disclosure includes commercial information related to on-going and planned activities associated with our Xe-100 high temperature gas pebble bed advanced reactor design. X-energy limits access to this proprietary and confidential information in order to maintain confidentiality.
 - d. Enclosure 1 contains information about the planned activities of X-energy related to the creation and submittal of licensing activities, forecast design development timeframes, and commercial strategy of our Xe-100 advanced reactor. Public disclosure of the information contained in Enclosure 1 would create substantial harm to X-energy because it would reveal valuable business information regarding X-energy's competitive expectations, assumptions, current position and strategy. Its use by a competitor could substantially improve the competitor's position in the design, manufacture, licensing, construction and operation of a similar competing product.



Enclosure 2
X-energy Letter
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- e. The Proprietary Information contained in Enclosure 1 is transmitted to the NRC in confidence and under the provisions of 10 CFR 2.390; it is to be received in confidence by the NRC. The information is properly marked.

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

Executed on July 31, 2018

[Month Day, Year]

A handwritten signature in blue ink that reads "Harlan W. Bowers".

Harlan Bowers

President

X Energy, LLC

Subscribed and sworn to before me,

Notary Public, this 31 day of July 2018

My Commission expires: Sept 18, 2021

A handwritten signature in black ink, likely belonging to the notary public.

MELANI MALFORTE KASA
Notary Public-Maryland
Prince George's County
My Commission Expires
September 18, 2021