

TERRESTRIAL ENERGY USA

Enclosure 2 to
TEUSA Letter: TEUSA181201

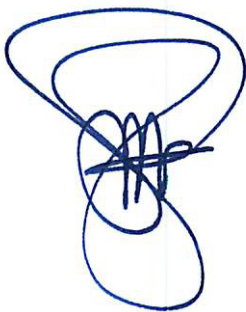
AFFIDAVIT PURSUANT TO 10 CFR 2.390

1. My name is Simon Irish. I am Chief Executive Officer of Terrestrial Energy USA (TEUSA) and I am authorized to make this request for withholding.
2. The purpose of this affidavit is to request withholding of the information herein enclosed as enclosure 1 to TEUSA letter "TEUSA181201, Terrestrial Energy USA Inc. Response to NRC Regulatory Issue Summary 2017-08", from public disclosure in its entirety, pursuant to 10 CFR 2.390.
3. I am making this request for withholding under the provisions of 10 CFR 2.390(a)(4) of the regulations of the Nuclear Regulatory Commission (NRC) and submitting this affidavit in conformance with the provisions of 10 CFR 2.390(b)(1).
 - a) Pursuant to the provisions 10 CFR 2.390(a)(4), the following is furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld. The information sought to be withheld from public disclosure is owned by TEUSA and has been held in confidence by TEUSA and its consultants.
 - b) The information sought to be protected is not available to the public to the best of our knowledge and belief.
 - c) The information is of the type that would customarily be held in confidence by TEUSA policy, which holds that information is to be held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:
 - i) It contains information descriptive of proprietary technology, where preventing its use by any of TEUSA's competitors without license from TEUSA constitutes a competitive economic advantage over other companies.
 - ii) Its use 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 a similar product.
 - iii) It reveals or can be used to infer cost or price information, production capacities, budget levels, or commercial strategies of TEUSA, its customers, or suppliers.
 - iv) It reveals or can be used to infer aspects of past, present, or future TEUSA or customer funded development plans and programs of potential commercial value to TEUSA.
 - v) It contains patentable ideas, for which patent protection may be desirable.

- vi) The use of such information by TEUSA gives TEUSA a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the TEUSA competitive position. It includes information that is marketable in many ways. The extent to which such information is available to competitors diminishes TEUSA's ability to sell products and services involving the use of the information.
 - vii) Use by our competitor(s) would put TEUSA at a competitive disadvantage by reducing their expenditure of resources at our expense.
 - viii) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving TEUSA of a competitive advantage.
 - ix) Unrestricted disclosure would jeopardize the position of prominence of TEUSA in the world market, and thereby give a market advantage to the competition of those countries.
 - x) The capacity of TEUSA and its investors to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- d) The information was 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.

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

Executed on: January 25th, 2019
(date)



Simon Irish
CEO, Terrestrial Energy USA