

MITSUBISHI NUCLEAR FUEL CO., LTD
STATEMENT OF PROPRIETARY INFORMATION
PURSUANT TO 49 CFR 7.14, 49 CFR 105.30, AND 10 CFR 2.390

I, Yoshiharu Kamiwaki, depose and say that I am General Manager of the Transportation and Service Department of Mitsubishi Nuclear Fuel Co., Ltd. (MNF), duly authorized to execute this statement of proprietary information and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. Edlow International Company on behalf of MNF is submitting this statement of proprietary information in conformance with the provisions of 49 CFR 7.14 and 49 CFR 105.30 of the Department's regulations, and with the provisions of 10 CFR 2.390 of the Commission's regulations. This information is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. 552, as amended, for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosures 1, as listed below:


- Enclosure 1 North American Version of Safety Analysis, May 2020

This document has been appropriately designated as proprietary.

Pursuant to the provisions of paragraph 7.14 of Part 7 and paragraph (a) (3) of Part 105 of the Department regulations, and the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations the following is furnished for consideration by the Department and by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced documents, should be withheld.

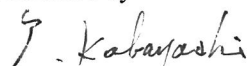
- 1) The information sought to be withheld involves portions of the Safety Analysis Report for Model MST-30 Package related to the design and analysis of MST-30 Package, which are owned and have been held in confidence by MNF.
- 2) The information is of a type customarily held in confidence by MNF and not customarily disclosed to the public. MNF has a rational basis for determining the types of information that is customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of MNF because the information consists of descriptions of the design and analysis of MST-30 Package, as well as company business sensitive information, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with MNF, take marketing or other actions to improve their product's position or impair the position of MNF product, and avoid developing similar data and analyses in support of their processes, methods, or apparatus.

Further the deponent sayeth not.



Yoshiharu Kamiwaki
General Manager, Transportation and Service Dept.
Mitsubishi Nuclear Fuel Co., Ltd.

Witnessed by



Toru Kobayashi
General Manager, General Affairs Dept.
Mitsubishi Nuclear Fuel Co., Ltd.