

STATE OF WASHINGTON     )  
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COUNTY OF BENTON     )

**Michael J. Wilbricht**, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as the Sr. Safeguards Specialist in Richland, Washington. I am responsible for the overall administration of the nuclear material control and accounting at Framatome's Richland, Washington nuclear fuel fabrication facility. This affidavit is based on my firsthand, personal knowledge and is submitted in my capacity as the Sr. Safeguards Specialist. This affidavit is submitted in accordance with the provisions of 10 CFR § 2.390.

2. I am familiar with the contents of the "Fundamental Nuclear Material Control Plan", E07-01-001, which provides nuclear material control information for the Framatome Inc., Richland, Washington Fuel Fabrication Facility as required by 10 CFR § 74.31. This document has been classified and designated as "Proprietary" by Framatome in accordance with the document control system and policies established by Framatome for the control and protection of proprietary and confidential information.

3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as Framatome. Competition among these companies including Framatome is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The "Fundamental Nuclear Material Control Plan" contains commercial information of a confidential nature that is not available in public sources or available to the public. This information contained in this report is commercial and confidential because it reveals specific information about the Framatome Richland manufacturing facility relative to its production throughput. All of this information can be used by competitors to gain undue insight into Framatome's commercial relationships, probable cost structure, operations and business.

5. Framatome Inc. will suffer considerable competitive harm if the contents of "Fundamental Nuclear Material Control Plan" are made available to Framatome domestic and international competitors. Finally, this material cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 20<sup>th</sup> day of September, 2022.



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Michael J. Wilbricht  
Sr. Safeguards Specialist

SUBSCRIBED before me this 20<sup>th</sup> day of September, 2022.



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Katherine Kerr  
NOTARY PUBLIC in and for the STATE OF WASHINGTON  
Residing at Richland, Washington  
My commission expires: September 12, 2026

