

**ENCLOSURE 2**

**CONTINUUM DYNAMICS, INC.**

**AFFIDAVIT**

**(3 PAGES FOLLOW)**



# Continuum Dynamics, Inc.

(609) 538-0444 (609) 538-0464 fax

34 Lexington Avenue Ewing, NJ 08618-2302

9 July 2009

Mr. Steve Hammer  
Monticello Nuclear Generating Plant  
Nuclear Management Company, LLC  
West Colony Road 75  
Monticello, MN 55369

SUBJECT: NSPM Draft Response L-MT-09-043 To Mechanical and Civil Engineering  
Branch RAIs – Steam Dryer Proprietary Information

To Whom It May Concern:

Enclosed please find copies of the above referenced documents which are being submitted to Nuclear Management Company, LLC in accordance with the Non-Disclosure Secrecy Agreement between Continuum Dynamics, Inc. and Nuclear Management Company, LLC dated December 5, 2006. Should the documents be submitted to the Nuclear Regulatory Commission, we have also enclosed an Affidavit requesting withholding of disclosure, in accordance with 10 CFR 2.390.

Very truly yours,

A handwritten signature in blue ink that reads "Alan J. Bilanin". The signature is fluid and cursive.

Alan J. Bilanin  
President and Senior Associate

09105  
Enclosures



**AFFIDAVIT**

Re: NSPM Draft Response L-MT-09-043 To Mechanical and Civil Engineering  
Branch RAIs – Steam Dryer Proprietary Information

I, Alan J. Bilanin, being duly sworn, depose and state as follows:

1. I hold the position of President and Senior Associate of Continuum Dynamics, Inc. (hereinafter referred to as C.D.I.), and I am authorized to make the request for withholding from Public Record the Information contained in the documents described in Paragraph 2. This Affidavit is submitted to the Nuclear Regulatory Commission (NRC) pursuant to 10 CFR 2.390(a)(4) based on the fact that the attached information consists of trade secret(s) of C.D.I. and that the NRC will receive the information from C.D.I. under privilege and in confidence.
2. The Information sought to be withheld, as transmitted to Nuclear Management LLC as attachments to C.D.I. Letter No. 09105 dated 9 July 2009, NSPM Draft Response L-MT-09-043 To Mechanical and Civil Engineering Branch RAIs – Steam Dryer Proprietary Information.
3. The Information summarizes:
  - (a) a process or method, including supporting data and analysis, where prevention of its use by C.D.I.'s competitors without license from C.D.I. constitutes a competitive advantage over other companies;
  - (b) Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;
  - (c) Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

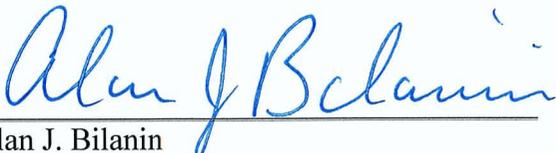
The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 3(a), 3(b) and 3(c) above.

4. The Information has been held in confidence by C.D.I., its owner. The Information has consistently been held in confidence by C.D.I. and no public disclosure has been made and it is not available to the public. All disclosures to third parties, which have been limited, have been made pursuant to the terms and conditions contained in C.D.I.'s Nondisclosure Secrecy Agreement which must be fully executed prior to disclosure.

5. The Information is a type customarily held in confidence by C.D.I. and there is a rational basis therefore. The Information is a type, which C.D.I. considers trade secret and is held in confidence by C.D.I. because it constitutes a source of competitive advantage in the competition and performance of such work in the industry. Public disclosure of the Information is likely to cause substantial harm to C.D.I.'s competitive position and foreclose or reduce the availability of profit-making opportunities.

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

Executed on this 9 day of JULY 2009.

  
Alan J. Bilanin  
Continuum Dynamics, Inc.

Subscribed and sworn before me this day: July 9, 2009

  
Eileen P. Burmeister, Notary Public

EILEEN P. BURMEISTER  
NOTARY PUBLIC OF NEW JERSEY  
MY COMM. EXPIRES MAY 6, 2012