

Attachment 38

**Redacted non-proprietary General Atomics-Electronics Systems Inc. document
04038800, Attachment 1 "White Paper: Qualification of RM-1000 Processors," Revision A
(Letter Item 14)**

BECHTEL POWER CORPORATION	Job Number: 25402
SUPPLIER DOCUMENT REVIEW STATUS	
STATUS CODE:	
1 <input type="checkbox"/> Work may proceed.	3 <input type="checkbox"/> Rejected. Revise and resubmit.
1C <input type="checkbox"/> Work may proceed. Editorial comments need only be incorporated if revised for other purposes.	4 <input checked="" type="checkbox"/> Review not required. Work may proceed.
2 <input type="checkbox"/> Revise and resubmit. Work may proceed subject to incorporation of changes indicated.	PO 77469-77448
Permission to proceed does not constitute acceptance or approval of design details, calculations, analysis, test methods, or materials developed or selected by the Supplier and does not relieve the Supplier from full compliance with contractual obligations.	
Reviewed by	Arch Civil CS Elect Mech MET PD Constr Startup STE
	N/A N/A JTT 11/28/11 N/A N/A N/A N/A N/A N/A N/A
Status By: <i>Joe Temples Joe T. Temples</i>	DATE 11/28/11

LEGIBILITY EVALUATED AND ACCEPTED FOR ISSUE. ALL PAGES.

SIGNATURE: *Joe Temples Joe T. Temples* **DATE:** 11/28/11

121554



PURCHASE PART RECEIVER

Date Printed: 7/29/2008 4:32:50 PM

Business Sensitive

PURCHASE ORDER	VENDOR ID	VENDOR NAME	PRODUCT CODE	COMMODITY CODE	BUYER	ORDER DATE	REC'D BY	
121554 / 2	CON015	[REDACTED]	010-10	04-999	SHARONP	7/22/2008	HECTORJ	
RECEIVER #	LINE #	WAREHOUSE/LOCATION/WBS	RECEIVED DATE	REQUESTOR	DELIVER TO	SHIP TO		
73693	2	MAIN/INSP	7/29/2008			GA - ESI		
PART #	INSP REQ'D	REV	UM	ORDER QTY	REC'D QTY	TRACE ID	MFG NAME	MFG PART #
50015790-001	Y		EA	10.00	10.00	RM012111	[REDACTED]	[REDACTED]
FLTR,ACTIVE,COM & NORM MODE,120VAC,5A					QA NOTE CODES: 41		Business Sensitive	

RECEIVING INSPECTION:

INSPECTED BY	DATE
Scorrea	07/30/08

STOCKROOM:

LOCATION ID	STOCKED BY	DATE
INSP		

WORK ORDER SHORTAGE FOR:

WORK ORDER # PIECE # QTY SHORT DUE DATE WAREHOUSE WBS CODE

/

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CERTIFICATE OF CONFORMANCE

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[Redacted] certifies that the following products have been manufactured to IPC 610 Class II and [Redacted] specifications. This product has been fully tested & inspected, and found to comply with all applicable requirements.

Model: [Redacted]
Date: 07/24/08
Quantity: 10 PIECES

Customer Order #: J65719

Isabel Duran
Quality Manager

GA-ESI
The certifications received have been checked for accuracy and completeness
INSPECTED BY: DCorrea
DATE: 07/30/08



BILL OF LADING

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PAGE 1

SHIP TO: GENERAL ATOMICS ELEC SYS 4949 GREENCRAIG LANE SAN DIEGO CA 92123 USA	SOLD TO: GENERAL ATOMICS ELEC SYS 4949 GREENCRAIG LANE SAN DIEGO CA 92123 USA
CONTACT NAME: GENERAL ATOMICS ELEC SYS	

CUSTOMER PO NO: 121554	SALES ORDER NO: 000065719 002	PICK LIST DATE: 24JUL08
SHIP VIA: UPS BLUE	FROM LOCATION: 312	SCHEDULED SHIP: 24JUL08
ORDERING SA: 92990	COORDINATOR: EMILY LAUDE	CUSTOMER NO: 000143272
		FRT CHG: 2.00

STOCK LOC / BIN	PART / DESCRIPTION	NUMBER CODE	U/M	QUANTITY ORDERED	QUANTITY SHIPPED	QUANTITY B/L	WEIGHT
ITRM: RIED GA-1	IC+105 5AMP 120VAC W/BS (240)	001 010	EA	10	10	10	20
SHIP VIA UPS BLUE CERTIFICATE OF CONFORMANCE AND TESTING REQUIRED END OF PICKLIST JUL 24 2008 #77693							

TRUCKER TO CALL: AT: HOURS BEFORE DELIVER:

SIGNATURE: Business Sensitive PICKED BY: A



SORRENTO ELECTRONICS

DATA BASE CHANGE REQUEST (DBCR)

SE Part/Drawing Number: 50015790-001 (12 characters)

SECTION 1

ORIGINATOR: Phil Newman DATE: 9-4-02
 CIRCLE: ACTION: ADD/MOD; PRODUCT: RMS ITR Business Sensitive ? YES or NO MAKE/PURCHASE
 PART/DRAWING NAME: _____
 DESCRIPTION: FLTR, ACTIVE, COM & NORM MODE, 120 VAC, SA
 MANUFACTURER: _____ SPECIAL TOOLS/PROCEDURES REQ'D?: YES or NO
 EXTERNAL/MANUFACTURER'S PART NUMBER: _____
 WHERE USED: ATTACHED PROJECT: SPARES
 COMMENTS/JUSTIFICATION: MODIFY SRCGI FUNCTIONAL TEST REQ'S

SECTION 2

TRANSCRIBER: _____ DATE: _____
 DESCRIPTION: _____ (40)
 REMARKS: _____ (18) U/M: _____ (2)
 REMARKS OVERFLOW: _____ (18)
 MFR 1: _____ (10) P/N: _____ (35)
 MFR 2: _____ (10) P/N: _____ (35)
 MFR 3: _____ (10) P/N: _____ (35)
 MFR 4: _____ (10) P/N: _____ (35)
 MATERIAL: _____ (15)
 MATERIAL OVERFLOW: _____ (15)
 FINISH: _____ (12) OVERFLOW: _____ (12)
 CIRCLE PART CODE: SCD SCE ALT OTHER

SECTION 3

DESIGN ENGINEERING: (NAME) Phil Newman DATE: 9-4-02

	SRCGI	BASIC COMPONENT	SAFETY RELATED EQUIPMENT	RE-QUALIFICATION REQUIRED	QUALIFICATION DOCUMENTS AFFECTED
YES	X		X		
NO		X		X	X

NOTE:
 Attach Any Critical Characteristics if SRCGI is marked YES.
 (Form SE0159 OP-7.3.240)

DOCUMENT NUMBER: _____

SECTION 4

QUALITY ASSURANCE

Q.A. PURCHASE ORDER NOTES: 1. 64 2. 41 3. _____

APPROVALS

DATA ENTRY:

IND. ENG: [Signature] DATE: 9/9/02 ENTERED BY: [Signature] DATE: 9-9-02
 Q.A. C.M. Miller DATE: 9/9/02 VERIFIED BY: [Signature] DATE: 9-9-02

PAGE 1 OF 2
 SEE ATTACHED FORM SE0159-2B (PAGE 2 OF 2)
 REVISION [A]

QUALITY CONTROL CRITICAL CHARACTERISTIC ACCEPTANCE PLAN
 "DBCR & QCI-146" (APPLICABLE DOCUMENTATION REQUIRED)

PART NUMBER: 50015790-001 P.O. #: 121554 ITEM #: 2 RECEIVER #: 73693
 DESCRIPTION: FILTER, ACTIVE, COMMON & NORMAL MODE, 120 VAC, 5A
 LOT SIZE: 10 SAMPLE SIZE: 4 NMR #: _____

REQUIREMENTS [X] (CRITICAL CHARACTERISTICS)	<input type="checkbox"/> SAMPLE LOT INSPECTION PER, NP-7218 AND QCI-100 TABLE 1 <input type="checkbox"/> REDUCED <input type="checkbox"/> NORMAL <input type="checkbox"/> TIGHTENED <input type="checkbox"/> SPECIAL NOTE: APPEND ENGINEERING/QUALITY JUSTIFICATION FOR ANY SAMPLING OF ANY CHARACTERISTIC WHICH IS NOT PER NORMAL TABLE 1 OF QCI 100.	<input checked="" type="checkbox"/> 100% INSPECTION AND TEST <input type="checkbox"/> SERIALIZATION REQUIRED
1. MARKING AND VISUAL	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	SERIAL NO./ PASS FAIL CCN SAMPLE LOT
		1. _____ [] []
2. DIMENSIONAL	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL CCN: <u>15-2-CE</u>	2. _____ [] [] 3. _____ [] []
3. FUNCTIONAL <i>C.M. Miller</i> <i>8/5/08</i>	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL CCN: _____	4. _____ [] [] 5. _____ [] []
4. MATERIAL	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL CCN: <u>N/A</u>	6. _____ [] [] 7. _____ [] []
5. OTHER/SPECIAL		8. _____ [] [] 9. _____ [] []
INSPECTOR SIGNATURE: <u>J Correa</u> DATE: <u>07/30/08</u> W/O #: _____ S/O #: _____ TEST TECH. SIGNATURE: <u>N/A</u> DATE: _____ WORKORDER #: _____		SERIALIZED RECORDED CHARACTERISTICS WHEN REQUIRED ABOVE: 1. _____ 2. _____ 3. _____
"NUCLEAR SAFETY RELATED"		Use additional sheets as required



COMMERCIAL GRADE ITEM ENGINEERING EVALUATION

SE Part Number: 50015790-001

Technical Evaluation:

This FLTR. ACTIVE.COM & NORM MODE. 120VAC.5A is an active electronic part whose normal function is to suppress noise/transients on AC lines The part is essential to RMS equipment safety function: to limit radiation exposure to the public per 10CFR100. and to maintain part form. fit. function & prevent or mitigate the consequences of part failure. Credible failure mode(s): Circuit Failure, and Failure to Actuate has been selected. Critical design & verification attribute selection, based on the foregoing is given in the CGI Worksheet

Equivalency Evaluation:

DETERMINATION OF CRITICAL CHARACTERISTICS

Environment Harsh: No Mild: Yes Seismic: Yes

Critical Characteristic	Acceptable Values	Range
Physical: General Config (Visual) Dimensions:L X W X H (inches) Mtg Hole (dia. [redacted] spacing)	Per Mfg Catalog [redacted]	Max Nom
Business Sensitive		
Functional: Freq. Response & Surge Current Capability and Rating (Ref Mfr. Test Data)	Current Audit of Mfr. Testing and results.	
Material: Casing (Visual) Weight	[redacted] Filled [redacted]	Max
Other: marked with Mfr P/N Test Lab report Ref Mil STD-220A or equiv insertion loss test and IEEE/ANSI-STD C62.41 surge test	Ref WDS Database	

Engineer: <i>[Signature]</i>	Date: 9/9/02
Independent Reviewer: <i>[Signature]</i>	Date: 9/9/02
QA Review: <i>[Signature]</i>	Date: 9/9/02



COMMERCIAL GRADE ITEM ENGINEERING EVALUATION

Date:	September 4, 2002	SE Part #:	50015790-001
Customer:	[Redacted]	Plant:	Salem Unit 1 & 2
Cust. P.O.#:	[Redacted]	Sales Order#:	[Redacted]

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Item: 0010

QUALIFIED APPLICATION

Previously Verified?: Yes

Top Assembly	Tag Numbers	Qual Report	Qual Type
04230841-001	1R11/12	04238925	Environ
04230841-001	1R11/12	04238926	Seismic

Notes:

Ref. S/O: 0201300

04230841-001 is Control Room Equipment associated with monitor assy. 04231201-001 and qual. reports qualify both assemblies.

COMMERCIAL GRADE EVALUATION

Supplier: [Redacted]

Notes:

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TECHNICAL EVALUATION

Has part been evaluated before?: Yes

Significant changes since last evaluation: *Ref. SO 0201300

Part replacement type Like-For-Like?: Yes Alternate: No

Technical Evaluation:

Functional Test changed to SE audit of supplier and test data.

Equivalency Evaluation:

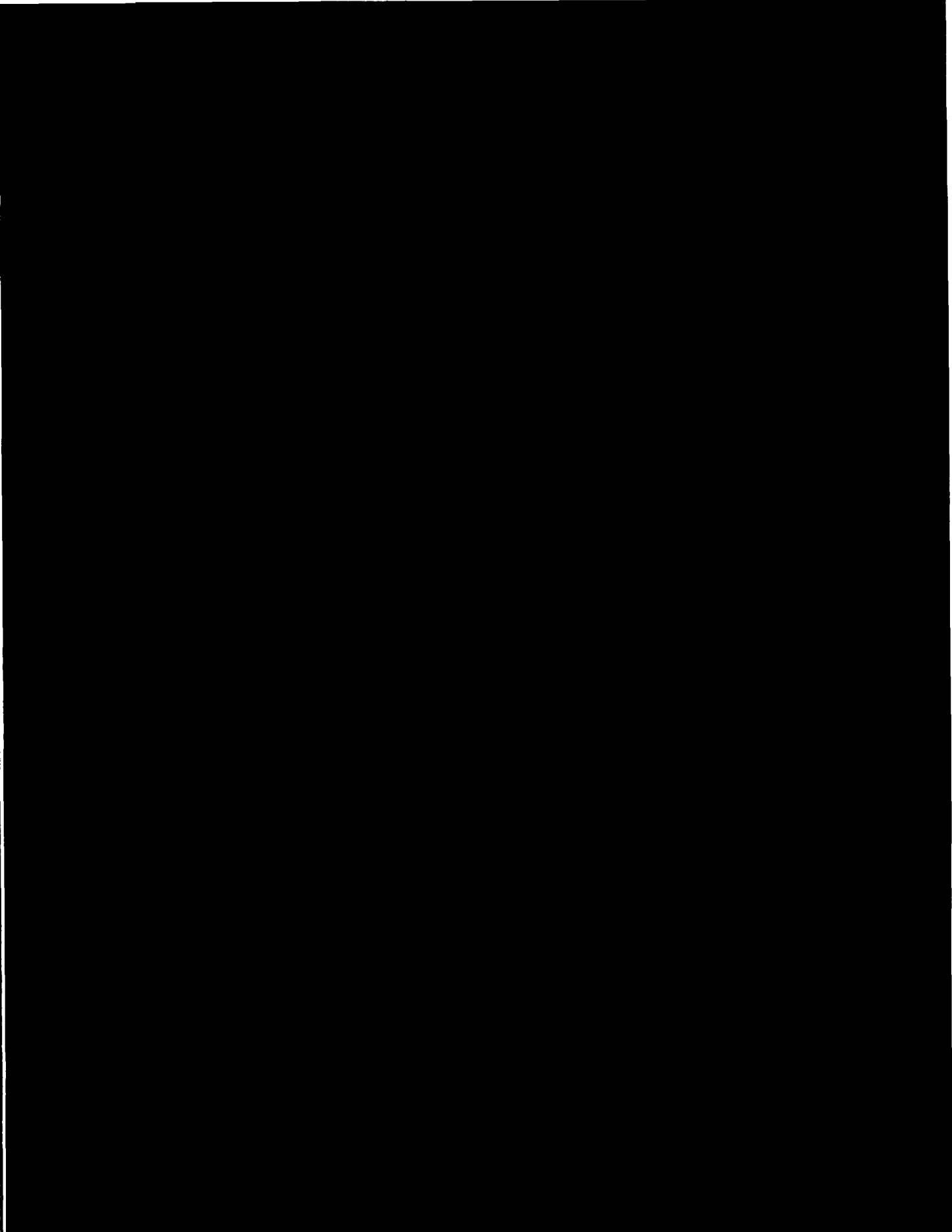
Engineer	<i>[Signature]</i>	Date:	9/9/02
Independent Reviewer	<i>[Signature]</i>	Date:	9/9/02
QA Review	<i>[Signature]</i>	Date:	9/9/02

Record Center add SRCGI to WDS
File with Part Number

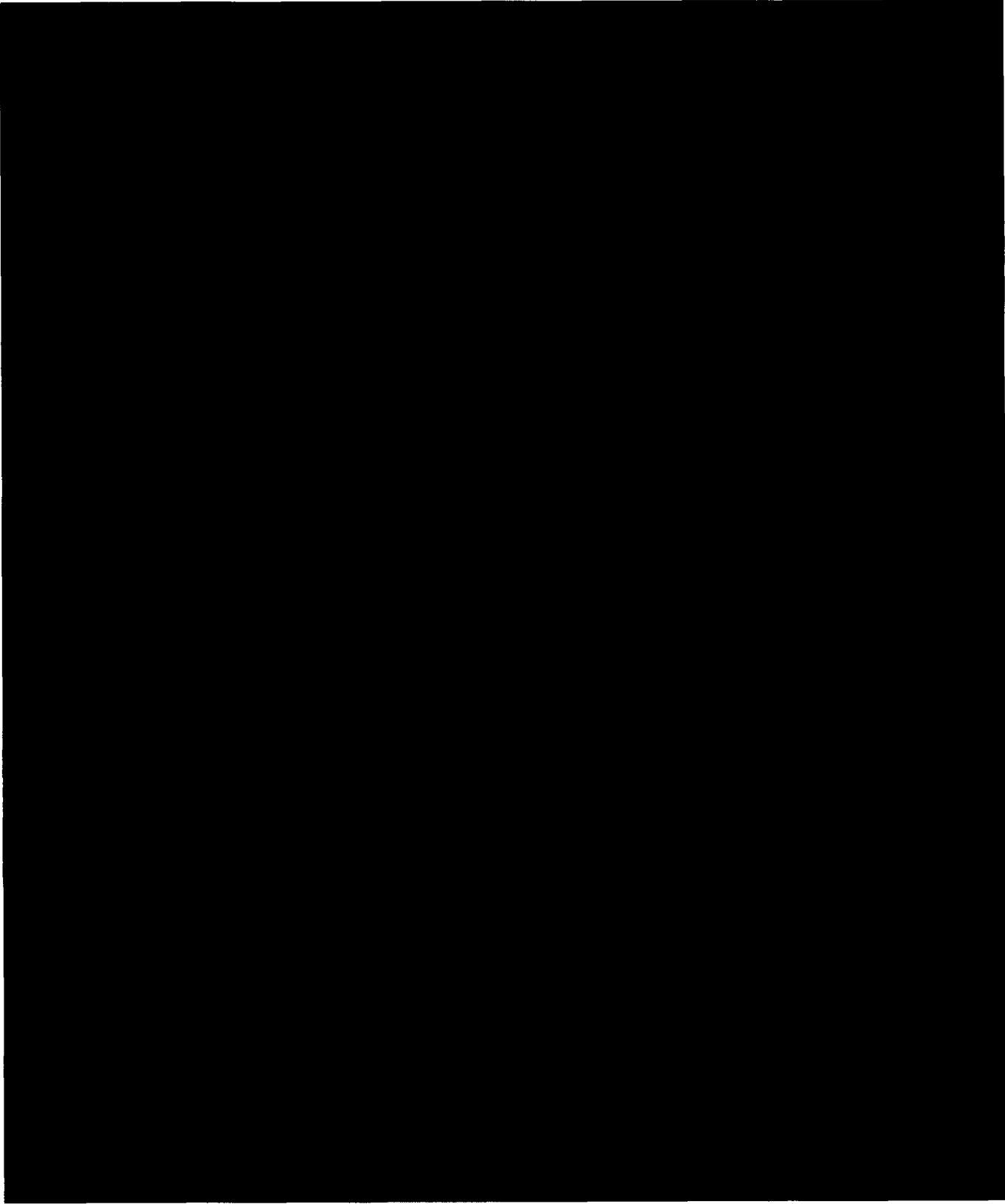
SE0159-2A

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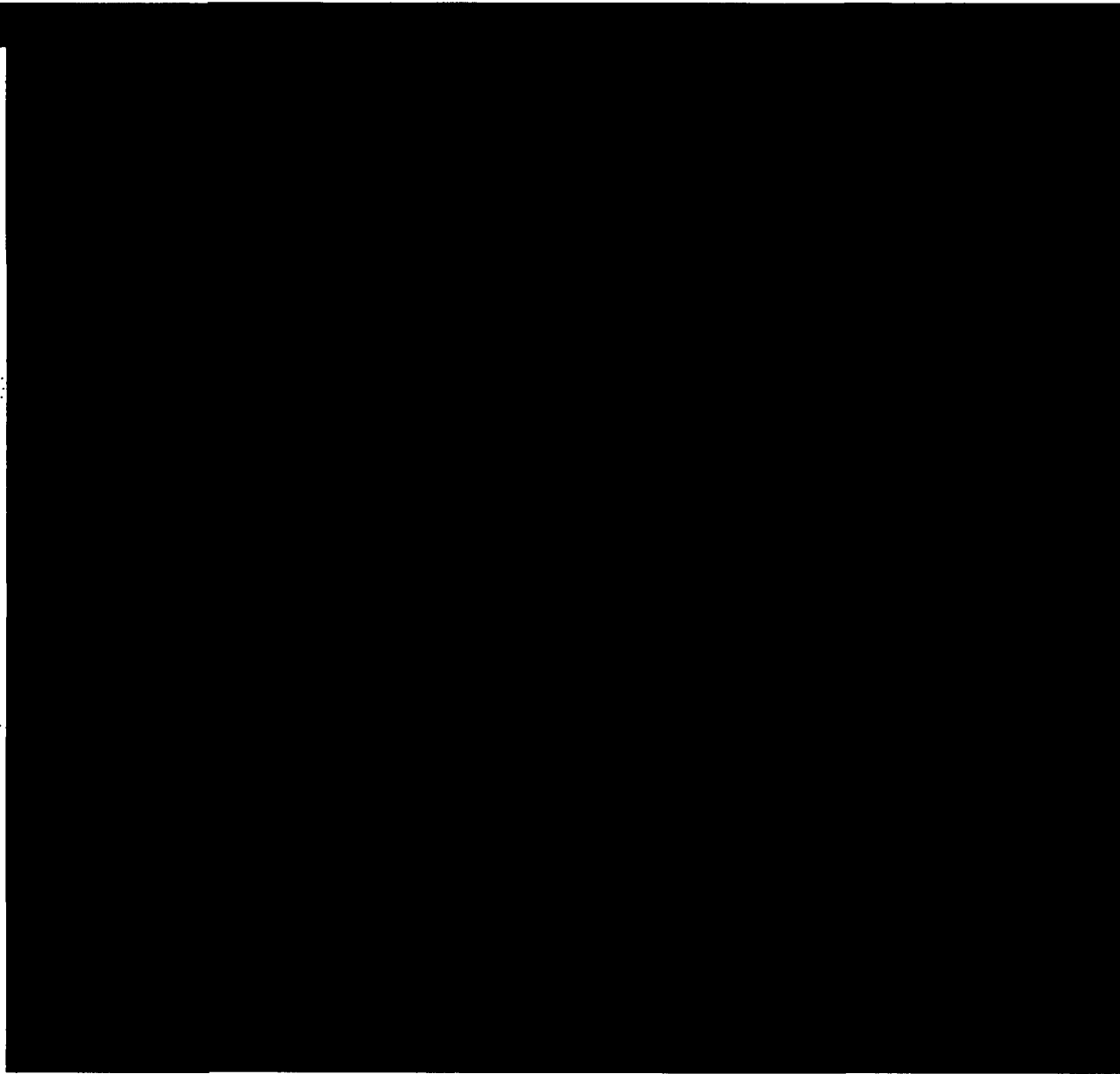
25402-011-V1A-HARA-00224-001



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ENG 15 - Part Database Change Report

Status Codes: 0 = Released; 1=OBS; 2=Pre-Released

PART: 50015790-001

U/M: EA P/M: P PROD GP: C STATUS: 0

Description: FLTR,ACTIVE,COM & NORM MODE,120VAC,5A

CAGE Priority: Mfg Part No. Mfg Company
01 [REDACTED] [REDACTED]

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REMARK1

REMARK2

Spare: Repairable: Wrk Lead Time: Shelf Life:
S N 14Catalog Update Catalog Price: Min Buy Qty Business Sensitive
9/9/02 [REDACTED] 1QC PO Note Codes 64 41
CCAP_REV A

Entered: 3/8/99 Updated: 9/9/02 Updated By CAVETTM

Part Codes:

NPP SCE ASL SCD ALT SRCG Y DATE 3/12/02

Basic Component N Safety Related: Y Re-Qual Req'd N
QC Doc Affect N Document No.

FINISH

MATERIAL: MilitarySpec

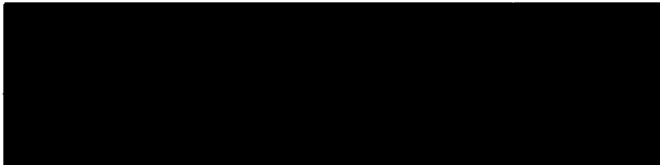
Attach to DBCR 50015790-001
BB 5-10-05
C. M. Miller 5/10/05

EXTERNAL SUPPLIER AUDIT CORRESPONDENCE

TO: FRANCES McCORD
FROM: C. M. MILLER

DATE: 6/4/03
IN REPLY REFER TO
CMM:03:39:QA

SUBJECT:



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AUDIT REPORT NUMBER: 02:5021

(FINAL REPORT)

PURPOSE

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The audit was conducted to verify that [redacted] is effectively implementing a Quality Program that meets the requirements of ISO 9001, as specified by the assigned Quality Level approved by ESI.

SCOPE

This was a full scope audit to provide an assessment of the Quality Program adequacy and implementation for manufacturing AC Line Filters to ESI Purchase Orders.

APPLICABLE DOCUMENTS

1. ISO 9001:1994.
2. [redacted]

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SUMMARY

A survey performed September 4, 2002 determined that [redacted] was properly implementing a Quality Program that satisfies the requirements of ISO 9001 as specified in their Quality Manual, with three exceptions. One finding and two observations were evident during performance of the audit.

The finding was in the area of Purchasing for failure to evaluate subcontractors on the basis of their ability to meet subcontract requirements. The finding is documented on Corrective Action Request (CAR) 913. See FINDINGS below for details. Business Sensitive

CAR 913 was closed on 6/4/03 after receiving confirmation that the calibration supplier [REDACTED] was evaluated by [REDACTED].

Two observations were also noted during the survey for failure to evaluate previous results using M&TE found out-of-tolerance during the scheduled calibration service and failure to perform the annually scheduled internal audit of the quality system. However, both were previously noted by the recent DNV ISO audit, and will be addressed by ISO audit follow-up. See OBSERVATIONS below for details.

With the closure of CAR 913, [REDACTED] [REDACTED] can now be given "Approved" status on the ESI Approved Suppliers List (ASL).

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AUDITOR

DATE

6/4/03

C. M. Miller, Lead Auditor

PERSONNEL CONTACTED

Gary Pasquale, Manager of Quality

CONDUCT

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1. Verified that [REDACTED] [REDACTED] had surveyed and evaluated their supplier of [REDACTED] [REDACTED]. CAR 913 was closed on 6/4/03.

FINDING

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1. The finding is documented in CAR 913 for failure to evaluate subcontractors on the basis of their ability to meet subcontract requirements, as specified in Section 6 of ISO 9001 and the [REDACTED] [REDACTED] [REDACTED] [REDACTED] Para. 3.3, Section 6 of the Quality Manual requires records of acceptable suppliers and subcontractors to be established and maintained. An evaluation of [REDACTED] a supplier of calibration services, has not been performed.

OBSERVATIONS

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1. ISO 9001, Section 11 and [REDACTED] [REDACTED] [REDACTED] [REDACTED] Para. 8.0 require that previous inspection and test results be evaluated when M&TE is found to be out-of-calibration. [REDACTED] has failed to perform such evaluations, as noted by the recent ISO Audit team as a "Risk Warning" that would be followed up at the next ISO Audit.
2. Section 17 of the Quality Manual requires an internal audit of the overall quality system to be performed twice each year. [REDACTED] [REDACTED] failed to perform the scheduled internal audit in April 2002, as noted by the recent ISO Audit Team as a "Risk Warning".

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FOLLOW-UP

CAR 913 was closed on 6/4/03. No further follow-up is required. This audit is considered **CLOSED**.

xc: Audit File Number: 02:5021
Purchasing

Attachment 39

General Atomics-Electronics Systems Inc. letter GA-ESI 4500, Request by General Atomics Electronic Systems, Inc. to Withhold Certain Information from Public Disclosure under 10CFR2.390 dated November 18, 2011 (Letter Item 14)

BECHTEL POWER CORPORATION							Job Number: 25402				
SUPPLIER DOCUMENT REVIEW STATUS											
STATUS CODE:											
1	<input type="checkbox"/> Work may proceed.					3	<input type="checkbox"/> Rejected. Revise and resubmit.				
1C	<input type="checkbox"/> Work may proceed. Editorial comments need only be incorporated if revised for other purposes.					4	<input checked="" type="checkbox"/> Review not required. Work may proceed.				
2	<input type="checkbox"/> Revise and resubmit. Work may proceed subject to incorporation of changes indicated.					PO 77469-77448					
Permission to proceed does not constitute acceptance or approval of design details, calculations, analysis, test methods, or materials developed or selected by the Supplier and does not relieve the Supplier from full compliance with contractual obligations.											
Reviewed by	Arch	Civil	CS	Elect	Mech	MET	PD	Constr	Startup	STE	
	N/A	N/A	JT 11/28/11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Status By: <i>Joe Temples for T. Temples</i>							DATE 11/28/11				



November 18, 2011

GA/ESI-4500

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 2055

Subject: **Request by General Atomics Electronic Systems, Inc. to Withhold Certain Information from Public Disclosure under 10CFR2.390**

Reference: Tennessee Valley Authority / Watts Bar 2 Completion Project

To Whom It May Concern:

General Atomics Electronic Systems Inc., (GA-ESI) hereby submits the following documents related to its Radiation Monitoring System pursuant to the specific request of Bechtel Power Corp. Control Systems in support of the Tennessee Valley Authority's Watts Bar 2 Completion Project:

04038800 White Paper: Qualification of RM-1000 Processors

Certain portions of the enclosed documents include GA-ESI proprietary commercially strategic information which GA-ESI has held in confidence, and which is not available through public sources. Accordingly, GA-ESI is submitting these documents in confidence and, as set forth in the enclosed affidavit of Mr. Paul G. Berner, GA-ESI requests that this information be treated as proprietary information under the provisions of 10CFR2.390 and be withheld from public disclosure. The enclosed affidavit addresses specifically the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the of the NRC's regulations.

GA-ESI is submitting both a proprietary version of the documents plus a nonproprietary version of the same. In the proprietary versions of the documents, the proprietary material is delineated by "business sensitive" or "trade secret" designation on specific paragraphs and highlighted text, sentence, figure or drawing to which the designation applies. In the nonproprietary versions, the proprietary information has been obscured/blacked-out.

If you have questions regarding this submittal, please do not hesitate to contact Mr. Paul Berner at (858) 522-8246 or paul.berner@ga-esi.com, or me at (858) 455-2823 or keith.asmussen@ga.com.

Very truly yours,

A handwritten signature in black ink that reads "Keith E. Asmussen".

Keith E. Asmussen, Ph.D., Director
Licensing, Safety and Nuclear Compliance

Enclosures: 1) Documents as listed in text
2) Affidavit of Mr. Paul G. Berner

STATE OF CALIFORNIA)

) ss

COUNTY OF SAN DIEGO)

AFFIDAVIT OF PAUL G. BERNER

I, Paul G. Berner, Radiation Monitoring Systems Program Director of General Atomics Electronic Systems, Inc., do hereby affirm and state:

- (1) I have been delegated the function of reviewing the information sought to be withheld by General Atomics Electronic Systems, Inc. and I am authorized to execute this affidavit on behalf of General Atomics Electronic Systems, Inc.
- (2) The affidavit is submitted under the provisions of 10CFR Part 2.390 in order to withhold the enclosed confidential commercial information (as set forth in paragraph 3 following) of General Atomics Electronic Systems, Inc. from public disclosure or publication.
- (3) The information sought to be withheld is related to General Atomics Electronic Systems' Radiation Monitoring System (i.e., RM-1000) and is contained in the documents designated as:

04038800 White paper: Qualification of RM-1000 Processors

The proprietary material in these documents is delineated by "business sensitive" or "trade secret" designation on specific paragraphs and highlighted text, sentence, figure or drawing to which the designation applies.

- (4) In making this application for withholding of proprietary information of which it is the owner, General Atomics Electronic Systems, Inc. relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552.(b)(4) and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10CFR Part 9.17(a)(4) and 2.390(a)(4) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential." The material for which exemption from disclosure is hereby sought is all "confidential commercial information," and some portions also qualify under the narrower definition of "trade secret," within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v.

Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).

- (5) Some examples of categories of information which fit into the definition of proprietary information are:
- a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by General Atomics Electronic Systems, Inc.'s competitors without license from General Atomics Electronic Systems, Inc. constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his or her expenditure of resources or improve his or her competitive position in the design, manufacture, shipment, installation, assurance or quality, or licensing of a similar product.
 - c. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.
- (6) The information sought to be withheld is being submitted to the NRC in confidence. The information is of a sort customarily held in confidence, is of a sort customarily held in confidence by General Atomics Electronic Systems, Inc., and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by General Atomics Electronic Systems, Inc. No public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (7) and (8) following.
- (7) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within General Atomics Electronic Systems, Inc. is controlled to protect it from unauthorized disclosure.

- (8) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his designee), and by the Legal Department, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside General Atomics Electronic Systems, Inc. are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements for protecting the information from further disclosure.
- (9) The information classified as proprietary was developed and compiled by General Atomics Electronic Systems, Inc. at a significant cost to General Atomics Electronic Systems, Inc. This information is classified as proprietary because it contains detailed historical data and analytical results not available elsewhere. This information would provide other parties, including competitors, with information from General Atomics Electronic Systems, Inc. technical database and the results of evaluations performed using codes developed by General Atomics Electronic Systems, Inc. Release of this information would improve a competitor's position without the competitor having to expend similar resources for the development of the database. A substantial effort has been expended by General Atomics Electronic Systems, Inc. to develop this information.
- (10) Public disclosure of the information sought to be withheld is likely to cause substantial harm to General Atomics Electronic Systems, Inc.'s competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of General Atomics Electronic Systems, Inc.'s comprehensive radiation monitoring system technology base, and its commercial value extends beyond the original development cost.

The value of the technology base goes beyond the extensive physical database and analytical methodology, and includes development of the expertise to determine and apply the appropriate evaluation process.

The research, development, engineering, and analytical costs comprise a substantial investment of time and money by General Atomics Electronic Systems, Inc.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it is clearly substantial.

General Atomics Electronic Systems, Inc. competitive advantage will be lost if its competitors are able to use the results of the General Atomics Electronic Systems, Inc.'s experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

GENERAL ATOMICS ELECTRONIC SYSTEMS, INC.

Paul G. Berner

Paul G. Berner, Radiation Monitoring
Systems Program Director

State of California
County of San Diego

On November 18, 2011 before me, Lynne-Marie Veters, Notary Public personally appeared Paul G. Berner, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and who acknowledged to me that he executed the same in his authorized capacity, and by his signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY of PERJURY under the laws of the state of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Lynne-Marie Veters

(Signature of Notary)

