

ENCLOSURE 3

Affidavit from Mr. Gary Camper

AFFIDAVIT OF GARY D. CAMPER

STATE OF VIRGINIA)
)
COUNTY OF CAMPBELL)

I, GARY D. CAMPER, being duly sworn, do hereby depose and say:

1. I am citizen of the United States of America. I am a resident of Forest, Virginia. My birth date is January 4, 1962.

2. I am presently employed by Babcock & Wilcox in Lynchburg, Virginia. I am the Operations Manager of Nuclear Operations Group (NOG). I have held this position since August 16, 2012. I have personal knowledge of the facts set forth in this affidavit, and if called and sworn as a witness in a deposition or before any court, I could and would testify competently under oath to these facts.

3. Babcock & Wilcox Nuclear Operations Group (B&W NOG) requests that the U.S. Nuclear Regulatory Commission (NRC) withhold Enclosures 1 and 2 to the letter dated June 25, 2013, Charles A. England to Merritt N. Baker; Reply to Request for Additional Information, from public disclosure in accordance with the provisions of 10 CFR 2.390.

4. The public disclosure of the information contained in the document(s) cited above is likely to cause substantial economic harm to the competitive advantage held by Babcock & Wilcox Nuclear Operations Group, Inc. and potentially violates contractual agreements with the U.S. Department of Energy.

5. The information contained in the document(s) described above has been held in confidence by Babcock & Wilcox Nuclear Operations Group, Inc. in that it is

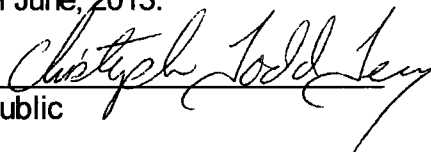
commercial and financial information as specified in Title 10 Code of Federal Regulations, Part 2.390(a) and proprietary contractual information as specified by contracts with the U.S. Department of Energy. The top of the first page of each document and the top of each page containing such information is marked Proprietary information – Withhold under 10 CFR 2.390 in accordance with 10 CFR 2.390(1)(i)(B). The basis for requesting that this document be withheld from public disclosure is explicitly marked on the top of the document in accordance with 10 CFR 2.390(b)(1)(i)(B). By handling this proprietary information in accordance with 10 CFR 2.390, the confidential nature of the information can be maintained and yet provide the NRC with the information in a form that can be conveniently handled within the agency.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is a true and correct statement of facts.



Gary D. Camper

Subscribed and sworn to before me this 25 day of June, 2013.



Notary Public

My commission expires: 01-31-2016

