



NRD LLC | 800-525-8076
2937 ALT BLVD. | 716-773-7634
PO BOX 310 | 716-773-7744 FAX
GRAND ISLAND, NY | e-mail: sales@nrdinc.com
14072-0310 | website: www.nrdinc.com

May 22, 2013

Document Control Desk
Director, Office of Federal and State Materials and Environmental Management Programs
Attention GLTS
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

To whom it may concern:

Enclosed is an affidavit requesting the withholding of information in accordance with 10CFR2.390. If there are any questions, or if additional information is required, please do not hesitate to contact me.

Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas M. Davis". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Douglas M. Davis
Director of Engineering and Regulatory
Compliance
Radiation Safety Officer
1-800-525-8076 X336

Enclosure

FSMELD



NRD LLC | 800-525-8076
 2937 ALT BLVD. | 716-773-7634
 PO BOX 310 | 716-773-7744 FAX
 GRAND ISLAND, NY | e-mail: sales@nrdinc.com
 14072-0310 | website: www.nrdinc.com

I am the Director of Engineering and Regulatory Compliance as well as the Radiation Safety Officer for NRD, LLC and have been delegated the responsibility of reviewing the described reports herein, which is sought to be withheld, and have been authorized to apply for its withholding. I am familiar with competitive practices in the market for static eliminators, containing nuclear sealed sources licensed by the Nuclear Regulatory Commission.

NRD, LLC is required by Title 10 CFR 32.52 to submit reports of the distribution of Generally Licensed devices to the Nuclear Regulatory Commission and individual Agreement States every calendar quarter, listing the names and addresses of each client to whom authorized devices are transferred to and licensees from whom we receive them. Additional information about the device, such as isotope, quantity and model number is also required.

NRD, LLC is the sole owner of the information provided in the reports described above. To the best of my knowledge, the information, as presented, is not currently available in public sources. NRD, LLC customarily treats this type of information as confidential. The company has an unwritten information classification and release policy and practice, and under this policy, lists of active customers and information relevant to commercial transactions is considered proprietary.

Examples of information considered by NRD, LLC as proprietary information are customer lists and amounts of shipments. Such information, if made available and used by our competitors, would provide direct tunnels, inroads/intrusion into our marketplaces. This would provide our competitors a head start and marked economic advantage and thus adversely impact well-being of our business.

Additionally, a significant part of NRD, LLC is supported by continuing services. A number of independent entities in USA and abroad could use the information in these device transfer reports including the customer list to enter our market space.

The information we are requesting to be withheld from public is all data printed in transfer report pages with headings of "Transfers of devices to and from General Licensees."

In view of the above, NRD, LLC respectfully requests that the quarterly distribution reports of Generally Licensed devices be withheld from public disclosure.

Signed:  Printed: Douglas M. Davis

Title: Director of Eng. & Reg. Compliance/ RSO

Date: 5.22.2013

Acknowledgement:

The forgoing affidavit was acknowledged as true and correct before me this day 5/22/2013

PAMELA A. MAY
 Notary Public, State of New York
 No. 01MA5051483
 Qualified in Niagara County
 Commission Expires Nov. 6, 2013

Signature 

Printed Name PAMELA A. MAY

Notary Public, State of New York, County of Erie

My Commission Expires 11/06/2013

Bhachu, Ujagar

From: E-RIDS1 Resource
Sent: Friday, May 31, 2013 12:43 PM
To: RidsManager Resource; Kotzalas, Margie; Kime, Traci; Bhachu, Ujagar
Subject: SUNSI Action: GL Report re Letter Forwarding Affidavit Requesting Withholding of Information.
Attachments: zxhokya3.1du.rtf

ADAMS Distribution Notification

FSME10 - FSME Incoming Mail - Generally Licensed Devices, e.g, Transfer Rpt, 1/4terly Rpt, Annual Rpt, Correction Rpt - 10 CFR 31.5, 31.7, 32.52, 32.56 (GLTS)

[Open ADAMS P8 Document\(GL Report re Letter Forwarding Affidavit Requesting Withholding of Information.\)](#)

[View ADAMS P8 Properties ML13144A582](#)

NOTICE: NON-PUBLIC PENDING REVIEW DOCUMENT

THIS DOCUMENT IS CURRENTLY PROFILED AS NON-PUBLIC AND REQUIRES THAT A SUNSI REVIEW BE COMPLETED AND AN AVAILABILITY (PUBLIC OR NON-PUBLIC) DECISION BE MADE WITHIN 5 WORKING DAYS.

Accession Number	ML13144A582
Title	GL Report re Letter Forwarding Affidavit Requesting Withholding of Information.
Docket Number	
Document Date	05/22/2013
Author Name	Davis D M
Author Affiliation	NRD, LLC
Addressee Name	
Addressee Affiliation	NRC/Document Control Desk NRC/FSME
Document Type	Proprietary Information Review General License Periodic Reports
Availability	Non-Publicly Available
Date to be Released	
Document Sensitivity	Non-Sensitive
Comment	
Date Added	05/24/2013
Keyword	DPCautoadd Non-Public Pending Review axw7 FSME-001 tjb2

