



**Valco Instruments Co. Inc.**

TOOLS FOR SCIENCE AND MEDICINE

**Dale Ashworth**  
Valco Instruments Company  
7811 Westview Drive  
Houston, TX 77055

Office of Federal and State Materials and  
Environmental Management Program  
Attn: GLTS  
U.S. Nuclear Regulatory Commission  
Washington, DC 29555-0001

---

**May 24, 2013**

Subject: Affidavit for confidentiality of information provided in quarterly transfer reports of generally licensed devices

In compliance with 10 CFR 2.390 (Public inspections, exemptions, requests for withholding), enclosed is Valco Instruments' affidavit declaring its reasons for requesting that information provided in quarterly reports of transfers of radioactive materials reports be withheld from public disclosure.

Copies of quarterly transfers to locations in Agreement States are also sent to respective Agreement State agencies and we request that the information in those copies be withheld from disclosure as well.

Please notify me at 713-688-9345 if you have any questions.

Regards,

---

**Dale R. Ashworth**  
Manager Analytical Devices and Systems  
Valco Instrument Company Inc.  
5/24/2013

---

P.O. Box 55603 Houston, Texas 77255

(713) 688-9345 (713) 688-3948 fax



Valco Instruments Co. Inc.

---

TOOLS FOR SCIENCE AND MEDICINE

## AFFIDAVIT

1. I am the Analytical Devices and Systems Manager for Valco Instrument Company Inc. I have been delegated by the RSO, Stanley D. Stearns, the responsibility of reviewing the report described in paragraph 2 below which we seek to be withheld from public view. I have been authorized to apply for its withholding. I am familiar with competitive practices in the market for analytical instrumentation, including gas chromatographs that incorporate helium ionization detectors (HIDs), and electron capture detectors (ECDs) containing sources licensed by the Nuclear Regulatory Commission.
2. Valco Instruments 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 HIDs and ECDs are transferred to, and from whom we receive them from. Additional information about these devices, such as isotope, quantity and model number are also required.
3. Valco Instruments Inc. is the sole owner of the information provided in the reports described in paragraph 2 above.
4. To the best of my knowledge, the information, as presented, is not currently available in public sources.
5. Valco Instruments, Inc. customarily treats this type of information as confidential. The company has a formal information security classification and disclosure policy, and under this policy, lists of active customers and information relevant to their measurement geometries, is considered proprietary.
6. Examples of information fitting Valco Instruments' definition of proprietary information are customer lists and volumes of shipments. Such information, if used by our competition, would provide direct inroads into our marketplaces, providing our competitors a marked economic advantage.
7. Additionally, a significant part of Valco's business is derived from continuing services. A number of independent organizations could use the information in these reports provides them with a convenient and no cost customer list from which to assail our market.
8. As well, Valco does do specialized application under confidentiality agreements with clients seeking competitive advantage within their own markets. Disclosure of their identity would not

---

P.O. Box 55603 Houston, Texas 77255

(713) 688-9345 (713) 688-3948 fax



Valco Instruments Co. Inc.

TOOLS FOR SCIENCE AND MEDICINE

allow us to comply with integrity in such agreements, thus reducing our reach into specialized markets.

9. The information Valco is requesting be withheld is all data printed in transfer report pages with headings of "Transfers to General Licensees" and "Transfers From General Licensees."

10. In view of the above, Valco Instruments Company, Inc. respectfully requests that the quarterly distribution reports of Generally Licensed devices be withheld from public disclosure.

Dated May 28, 2013 Dale Ashworth (Signed) [Signature]

ACKNOWLEDGEMENT

The foregoing affidavit was acknowledged as true and correct before me this day, May 28, 2013

by Jennifer Ann Franke who was duly sworn.

Jennifer Ann Franke  
Notary Public

