



September 4, 2013

U.S. Nuclear Regulatory Commission
Document Control Desk
Director, Office of Federal and State Materials
and Environmental Management Programs
Attention: GLTS
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: REQUEST FOR WITHHOLDING OF PROPRIETARY
INFORMATION FROM PUBLIC DISCLOURE

To Whom It May Concern:

I am the Global Radiation Program Manager for Morpho Detection, Inc. (MDI). On behalf of MDI, I am writing to request that the U.S. Nuclear Regulatory Commission withhold certain proprietary information from public disclosure.

The proprietary information for which MDI is requesting withholding is all client data printed in transfer report documents which bear the subject header containing the words "Generally Licensed Device Shipments" or "Transfers of Devices to and from General Licensees." The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the U.S. Nuclear Regulatory Commission.

Should there be any questions about this request, please do not hesitate to contact me at richard.miguel@morphodetection.com or send correspondence to the address listed below.

Respectfully Submitted,

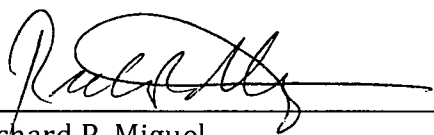
A handwritten signature in black ink, appearing to read 'Richard R. Miguel', written over a horizontal line.

Richard R. Miguel
Global Radiation Program Manager

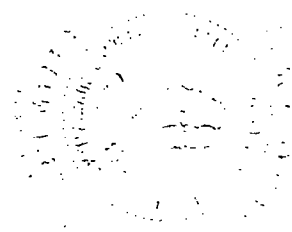
AFFIDAVIT IN SUPPORT OF REQUEST FOR WITHHOLDING OF
PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

- 1) I am the Global Radiation Program Manager for Morpho Detection, Inc. (MDI) and have been delegated the responsibility of reviewing the device transfer reports which are sought to be withheld, and have been authorized to apply for its withholding. I am familiar with competitive practices in the market for products containing radioactive sealed sources licensed by the Nuclear Regulatory Commission.
- 2) MDI 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 clients to whom authorized devices are transferred and from whom authorized devices are received. Additional information about the devices, such as isotope, quantity, and model number, is also required.
- 3) MDI is the sole owner of the information provided in the reports described in (2). To the best of my knowledge and belief, the information, as presented, is not currently available in public sources. MDI customarily treats this type of information as confidential.
- 4) MDI has an information classification and release policy and practice; under this policy, lists of customers, clients, amounts of shipments, and information relevant to commercial transactions are considered proprietary.
 - a) Such information, if made available and used by our competitors, would create direct tunnels, inroads, and/or 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.
 - b) A significant part of MDI is supported by continuing services. A number of independent entities in the United States and abroad could use the information in these device transfer reports including the customer list to enter into our market space.
- 5) On this basis, MDI respectfully requests that the quarterly reports of Generally Licensed devices, bearing the subject header containing the words "Generally Licensed Device Shipments" or "Transfers of Devices to and from General Licensees," be withheld from public disclosure.

Signed under the penalties of perjury on the 4th day of September, 2013:



Richard R. Miguel



Sworn to and subscribed before me
this 4th day of September, 2013



JODI MORRIS
Notary Public
Commonwealth of Massachusetts
My Commission Expires
February 17, 2017



Notary Public