



CAMMENGA COMPANY, LLC
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September 12, 2013

Withholding of Proprietary Information

To Whom It May Concern:

Cammenga & Associates, LLC would like to withhold information from public record from its application for new exemption license dated September 6, 2013. Attached to this submission is an affidavit based on the guidelines found in 10 CFR 2.390.

Please contact me with any questions regarding this submission.

Best Regards,

A handwritten signature in black ink, appearing to read 'CJ Karchon', written in a cursive style.

Christopher J. Karchon
Vice President of Sales



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AFFIDAVIT

STATE OF MICHIGAN)
)
COUNTY OF WAYNE)

1. I, Christopher J. Karchon, am the Vice President of Sales for Cammenga Company, LLC (“Cammenga”). Accordingly, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure, which is provided in Cammenga’s “Application for Withholding” attached as Exhibit A to this Affidavit (the “Proprietary Information”), and I am vested with the authority to apply for such withholding on Cammenga’s behalf.
2. I am knowledgeable of the principles and procedures applied by Cammenga in determining the proprietary nature of Cammenga’s methodologies and concepts, and as such, categorize the Proprietary Information as trade secret and commercial or financial information.
3. Cammenga is submitting the attached request for withholding proprietary information in reliance on public disclosure exemptions provided by the Trade Secrets Act, 18 USC § 1905, and NRC Regulations, 10 CFR §§ 2.309(a)(4) and 9.17(a)(4).
4. Cammenga utilized the following criteria in determining that the Proprietary Information is proprietary to Cammenga:
 - i. The Proprietary Information reveals the distinguishing aspects of a process, component, or method whose unlicensed use by any of Cammenga’s competitors would constitute a competitive economic advantage over other companies.
 - ii. The Proprietary Information consists of supporting data, including test data, relative to a process, component, structure or method, the application of which secures a competitive position for Cammenga, including product optimization.
 - iii. A competitor’s use of the Proprietary Information would reduce such competitor’s expenditure of resources, or improve its competitive position, in the design,

manufacture, shipment, installation, assurance of quality, or licensing of a similar product.

5. In accordance with 10 CFR § 2.309(b)(4), the following identify the reasons to withhold the Proprietary Information from public disclosure.
 - i. The Proprietary Information is the property of Cammenga and has not been made available to the public. The Proprietary Information has been held in confidence by Cammenga since its inception and continues to remain confidential.
 - ii. The Proprietary Information is of a type customarily held in confidence by Cammenga.
 - a. The Proprietary Information constitutes a “Trade Secret” under the Michigan Uniform Trade Secrets Act, MCL §§ 445.1901-445.1910, *et seq.*, because it:
 1. Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use, and
 2. Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.
 - b. There is a rational basis in which Cammenga deems such information as proprietary, and thus, not made available for public disclosure. Strict compliance with Cammenga’s confidentiality policy safeguards sensitive information, which in turn, affords Cammenga a competitive advantage in its market.
 1. I, Christopher J. Karchon have the ultimate say in what information is deemed to be proprietary. This is determined based on the criteria set forth in section 4 and 5 of this document. The only individuals who have seen this information either are employed by Cammenga, or are outside suppliers who have signed non-disclosure agreements.
 - iii. The Proprietary Information is being transmitted to the U.S. Nuclear Regulatory Commission by Cammenga in confidence, and it is to be received in confidence by the Commission pursuant to 10 CFR § 2.309(b)(4).
 - iv. The Proprietary Information is neither available in public sources nor generally known in the public domain. After careful and extensive research, Cammenga found no comparable methodologies or patentable processes. Thereafter, Cammenga classified its developments as trade secrets and held the Proprietary Information as proprietary and as trade secret.

- v. Public disclosure of the Proprietary Information is highly likely to cause substantial harm to Cammenga's competitive position because it will permit competitors to create similar products and either reduce or foreclose future business opportunities.
 - a. The proprietary information embedded in the product's design is essential to yield a competitive advantage in the Military and Tactical marketplace. The information is extremely valuable to Cammenga as it has invested a substantial amount of time, effort, and resources in engineering the methodology critical to assembling the Proprietary Information. Cammenga's dedication to research, development, and NRC review costs were incumbent to the advancement of the Proprietary Information's process and analytics.
 - b. Public disclosure of the Proprietary Information will afford competitors the opportunity to take advantage of the technology developed and optimized by Cammenga without proportionate expenditure. The only method to duplicate equivalent proprietary information is to devote considerable employee manpower and resources to research and development. Publication of the Proprietary Information would provide a windfall to Cammenga's competitors by foregoing the requisite investment to reproduce Cammenga's analytic processes while reducing Cammenga's competitive advantage.
6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

CAMMENGA COMPANY, LLC

By: *C. J. Karchon*
 Print Name: Christopher J. Karchon
 Title: VP of Sales

Subscribed and sworn to before me
 on this 12 day of September, 2013.

Muna Ilayan
 Notary Public

Muna Ilayan
 Notary Public, Wayne County, Michigan
 Acting in Wayne County, Michigan
 My Commission Expires January 7, 2019

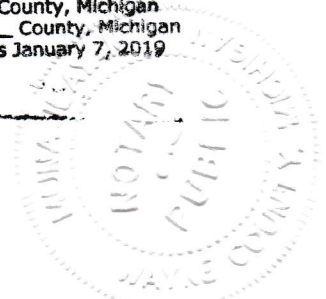


EXHIBIT A

(Proprietary Information)

The following sections from the package submitted to the NRC on September 6, 2013 should be withheld as proprietary:

- 3H Series General Discussion
- 3H Series Form 313 Answers 5-11
- J582T Compass General Discussion
- J582T Compass Form 313 Answers 5-6
- D3-T Destinate General Discussion
- D3-T Destinate Construction & Design
- D3-T Destinate Form 313 Answers 5-6
- 3H-Tritium Knife Series General Discussion
- 3H-Tritium Knife Series Construction & Design
- 3H-Tritium Knife Series Form 313 Questions 5-6
- Attachment 14 Knife Model Comparison Chart
- Attachment 15 TK3 Knife Drawings
- Attachment 16 3H-Tritium Series Knife Prototype Test Procedures
- Attachment 18 Knife Impact Tests Compared to Compass Tests
- Attachment 19 Prototype Test Results
- Attachment 21 Knife Labeling
- Attachment 23 TK4 Drawings
- Attachment 26 Solubility in Water + Explanation of Equations
- Attachment 27 Probabilities/Safety Criteria for Knives
- Attachment 28 D3-T Prototype Test Results
- Attachment 29 3H/J582T Safety Criteria/Probabilities
- Attachment 30 External Radiation Levels, Transformations, Solubility Concerns
- Attachment 32 J582T Drawings
- Attachment 33 3H Drawings