



UNITED STATES
NUCLEAR REGULATORY COMMISSION

Office of Federal and State Materials and
Environmental Management Programs
WASHINGTON, DC 20555 - 0001

September 16, 2013

Docket No. 030-38679
Mail Control: 581584

License No. Pending

Christopher J. Karchon
Vice President of Sales
Cammenga and Associates, LLC
2011 Bailey Street
Dearborn, MI 48124

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC
DISCLOSURE, CAMMENGA AND ASSOCIATES, LLC

Dear Mr. Karchon,

Cammenga and Associates, LLC submitted a letter, dated September 6, 2013, for distributing 3H Series, J582T Compass, 3H-Tritium Series Knife, D3-T Destinate Compass and an affidavit dated September 12, 2013. Cammenga and Associates has requested that fourteen attachments (#14, 15, 16, 18, 19, 21, 23, 26, 27, 28, 29, 30, 32, and 33) plus 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, and 3H-Tritium Knife Series Form 313 Questions 5-6 be withheld from public disclosure pursuant to 10 CFR 2.390.

Cammenga and Associates stated that these documents should be considered exempt from mandatory public disclosure for the following reasons:

- a) This information is maintained confidential as this directly relates to Cammenga and Associates' ability to grow and maintain its business interests related to these products.
- b) Production drawings contain sufficient information to allow for the direct reproduction and fabrication of the described devices/sources.
- c) This information was transmitted and received by the USNRC in confidence in support of Cammenga and Associates' application for exempt distribution of these products.
- d) The information is not available in any public sources.
- e) Cammenga and Associates has invested resources to develop these products designs; release of this information would allow competitors to directly duplicate these devices and therefore directly compete against Cammenga and Associates in domestic and foreign markets.

We have reviewed your application and the engineering drawings in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statements, we have determined that the submitted information sought to be withheld contains proprietary commercial information.

Therefore, the information listed as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5).

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

Sincerely,

/RA/

Shirley S. Xu
Licensing Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Christopher J. Karchon

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Sincerely,
/RA/
Shirley S. Xu
Licensing Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs

DISTRIBUTION: Rosalyn Jones, Fees, MSSA r/f MSSA TA

SUNSI Review Complete: S Xu

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