



September 18, 2014
NWMI-LTR-014

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Washington, DC 20555

RE: NRC PROJECT NO. 0803 – NORTHWEST MEDICAL ISOTOPES, LLC REQUEST
DOCUMENT(S) SUBMISSION

Northwest Medical Isotopes, LLC (NWMI) is submitting the following documents to the U.S. Nuclear Regulatory Commission (NRC):

1. Northwest Medical Isotopes, LLC Pre Construction Permit Application Meeting, September 30, 2014 (Public Version)
2. Northwest Medical Isotopes, LLC Pre Construction Permit Application Meeting, September 30, 2014 (Non-Public Version with Affidavit)
3. Northwest Medical Isotopes, LLC Uranium Lease Take Back Program Forecast (Non-Public Version with Affidavit)

NWMI considers two of the documents being submitted to be proprietary and requests that they be withheld from public disclosure, pursuant to 10 CFR 2.390. The required affidavit for each document to withhold information from public disclosure is provided with each confidential and proprietary document.

If you have any questions, contact me on 509-430-6921 or carolyn.haass@nwmedicalisotopes.com.

Sincerely,

Carolyn C. Haass
Vice President and Technical Program Director

cc: Alexander Adams, Branch Chief
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

William Schuster, Project Manager
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

4801
KRR

10 CFR 2.390
AFFIDAVIT OF Carolyn C. Haass

AFFIDAVIT

I, **Carolyn C. Haass**, herby affirm and state as follows:

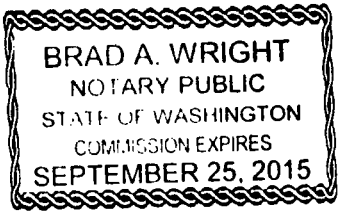
1. I am a Vice President and Officer of Northwest Medical Isotopes, LLC (NWMI), and I have been authorized to execute this affidavit on behalf of NWMI.
2. The information contained in the enclosed letter dated April 15, 2014 is proprietary commercial information related to NWMI becoming a domestic supplier of Molybdenum-99 (⁹⁹Mo). The proprietary information includes sensitive business information created by or for NWMI. This information should be held in confidence by the NRC and withheld from public disclosure.
3. In making this application for withholding of proprietary information of which it is the owner, NWMI believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. Section 1905, and NRC regulations 10 CFR 9.17(a)(4) and 2.390(a)(4) for trade secrets and commercial information because:
 - i. This information is and has been in confidence by NWMI.
 - ii. This information is of a type that is customarily held in confidence by NWMI, and there is a rational basis for doing so because the information includes sensitive business information pertain
 - iii. The information is being transmitted to the NRC voluntarily and in confidence.
 - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - v. Public disclosure of this information would create substantial harm to the competitive position of NWMI by disclosing certain business decisions NWMI has made or is considering and the analysis that went behind those decisions. Development and evaluation of this commercial information was achieved at, and disclosure could lead to additional, significant cost to NWMI.
 - vi. Public disclosure of the information sought to be withheld is likely to cause substantial harm to NWMI'S competitive position and foreclose or reduce the availability of profit-making opportunities. The value of the information goes beyond the disclosure of actual information pertaining to NWMI's potential business, and includes substantial time and work towards developing the project, and represents significant efforts by NWMI and its associates. The research, development, engineering, and analytical costs comprise a substantial investment of time and money by NWMI. The precise value of the information is difficult to quantify, but clearly is substantial.
 - vii. NWMI's competitive advantage will be lost if its competitors are able to use the results of NWMI's activities to aid their own commercial activities. The value of this information to NWMI would be lost if the information were disclosed to the public. Making such information available to other entities without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive NWMI of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment.

Carolyn C Haass

Carolyn C. Haass

Subscribed and sworn before me, a Notary Public, in and for the State of Washington, this 18th day of September 2014.

Witness my hand and Notarial Seal.



Brad A. Wright
Notary Public

My Commission Expires: 9/25/15

9/18/14
Date

10 CFR 2.390
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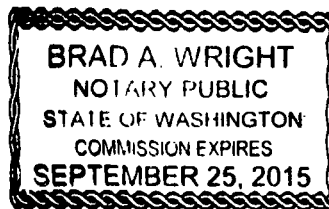
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