



# AEROTEST OPERATIONS, INC.

3455 FOSTORIA WAY • SAN RAMON, CA 94583 • (925) 866-1212 • FAX (925) 866-1716

February 21, 2017

ATTENTION: Document Control Desk  
U.S. Nuclear Regulatory Commission  
White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

AEROTEST RADIOGRAPHY AND RESEARCH REACTOR  
DOCKET NO. 50-228/LICENSE NO. R-98.

RESPONSE TO REQUEST FOR HOLDING INFORMATION FROM PUBLIC DISCLOSURE

Ladies and Gentlemen:

Enclosed please find Aerotest's affidavits with corrected requests for a hold on proprietary information from public disclosure. This is a response to the NRC's letter dated February 2, 2018 that describes an unsatisfactory submission to identify and support Aerotest's request for confidentiality of information.

Should you have any questions or require additional information regarding this submission, please contact AO President David M. Slaughter, Ph.D. at (801) 631 5919 or dmsraven@gmail.com

Sincerely yours,

David M. Slaughter, Ph.D.  
President, Aerotest Operations, Inc.

Enclosures:

1. Proprietary RAI Gen 2 Appendix A
2. Proprietary Table 15.1, USAR Chapter 15
3. Chapter 15, USAR
4. AO Affidavits

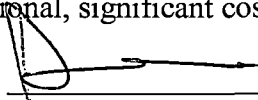
NOTE: Enclosures to this document contain confidential information submitted under 10 CFR 2.390(a)(4).

A020  
NRR

**AFFIDAVIT**

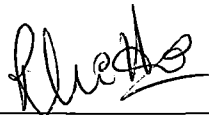
I, David M. Slaughter, hereby affirm and state as follows:

1. I am the President of Aerotest Operations, Inc authorized to execute this affidavit on behalf of Aerotest Operations.
2. The information contained in document entitled "Appendix A: Description of Aerotest Operations' Activities" found in the Aerotest RAI response dated December 20 2017. The proprietary information includes sensitive business information related to Aerotest Operations. 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 Aerotest President believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information At ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. Section 1905, and NRC regulations 10 CFR 2.390(a)(4) for trade secrets and commercial information because:
  - i. This information is and has been held in confidence by Aerotest Operations.
  - ii. This information is of a type that is customarily held in confidence by Aerotest, and there is a rational basis for doing so because the information includes sensitive business information pertaining to the strategic nature of research, development and investigative services.
  - iii. The information is being transmitted to the NRC 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 Aerotest by disclosing certain business decisions Aerotest 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 Aerotest.

  
\_\_\_\_\_  
David M. Slaughter

Subscribed and sworn before me, a Notary Public, in and for the State of California, this 20<sup>th</sup> day of February 2018.

Witness my hand and Notarial Seal.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

12/18/2020

2/20/2018  
Date:

*Pl find attached acknowledgement*

# Jurat Certificate California only

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Contra Costa

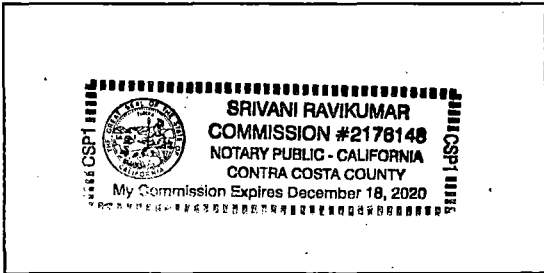
Subscribed and sworn to (or affirmed) before me on this 20th

day of February, 2020, by David M. Slaughter

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Place Seal Here

Signature [Handwritten Signature]



## Description of Attached Document

Type or Title of Document Affidavit

Document Date

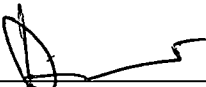
Number of Pages

Signer(s) Other Than Named Above

**AFFIDAVIT**


I, David M. Slaughter, hereby affirm and state as follows:

1. I am the President of Aerotest Operations, Inc authorized to execute this affidavit on behalf of Aerotest Operations.
2. The information contained in Table 15.1 in its entirety found in Chapter 15, USAR dated 2017. The proprietary information includes sensitive business information related to Aerotest Operations. 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 Aerotest President believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information At ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. Section 1905, and NRC regulations 10 CFR 2.390(a)(4) for trade secrets and commercial information because:
  - i. This information is and has been held in confidence by Aerotest Operations.
  - ii. This information is of a type that is customarily held in confidence by Aerotest, and there is a rational basis for doing so because the information includes sensitive business information pertaining to the strategic nature of research, development and investigative services.
  - iii. The information is being transmitted to the NRC 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 Aerotest by disclosing certain business decisions Aerotest 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 Aerotest.

  
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David M. Slaughter

Subscribed and sworn before me, a Notary Public, in and for the State of California, this 20<sup>th</sup> day of February 2018.

Witness my hand and Notarial Seal.

  
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My Commission Expires: 12/18/2020  
Date: 2/20/2018

*M- And attached Notary acknowledgement*



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State of California

County of Contra Costa

Subscribed and sworn to (or affirmed) before me on this 20th

day of February 18, 2020, by David M. Slaughter

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Place Seal Here

Signature [Handwritten Signature]



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