

# neutron products inc

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U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Re: Request for Additional Information dated December 12, 2017  
Drawing 240116 Rev. J

I am writing to transmit our modified reply to the RAI referenced above.

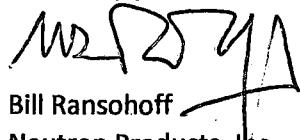
In addition, we request that all revisions of Drawing 240116, including Rev. J which is enclosed, be withheld from public disclosure due to the proprietary nature of the information contained therein. In accordance with the requirements of 10 CFR 2.390, this request is supported by the attached affidavit.

Furthermore, as discussed in RIS 2005-31, the referenced drawing contains security-related sensitive information and, on that basis, should also be withheld from public disclosure under 10 CFR 2.390.

In order to further the NRC's practice of providing public access to as much information as possible, we have also attached a version of the drawing with the proprietary and security-related sensitive information removed.

If any additional information is required, please advise.

Very truly yours,



Bill Ransohoff  
Neutron Products, Inc.  
President

**AFFIDAVIT**

I, William L. Ransohoff, am authorized to execute the Affidavit which follows on behalf of Neutron Products, Inc. The statements made in this Affidavit are true and correct to the best of my knowledge, information and belief.

WLR 3/1/2018

William L. Ransohoff  
Neutron Products, Inc.  
President

1. I am President of Neutron Products, Inc., and, in that capacity, have a responsibility to protect the company's proprietary information.
2. The intent of this Affidavit is to comply with the provisions of 10 CFR 2.390, Public Inspections, Exemptions, Requests for Withholding, in order that the proprietary information of Neutron Products submitted to the NRC may be withheld from public disclosure.
3. I have personal knowledge of the company's policies regarding the designation and protection of its proprietary information.
4. The document which we request be withheld from public disclosure is any revision of drawing 240116, on the basis that it contains proprietary information. In particular, the document being submitted with this affidavit is Revision J of drawing 240116.
5. The drawing shows details of packaging used for the shipment of radioactive materials. The packaging was designed and developed by the company at considerable expense, the company derives revenue from the use of the packaging, and competitors could benefit – to the detriment of the company – by acquiring copies of the drawing.
6. The company has always considered the entire drawing to be proprietary, confidential information and, as such, the drawing bears the following:

"This document and all data contained herein is the property of Neutron Products, Inc. and is supplied in confidence only under the express conditions that it will be used only for the purpose intended and that it will not be reproduced or transmitted to others without written authorization and that it is to be returned upon demand."

7. We have often protected the proprietary nature of this (and other) drawing(s) by denying requests from others in the industry for complete copies of the drawings, if we do not believe it to be in the company's interest to provide them.
8. The referenced drawing is not available from public sources. However, the packaging is used in commerce and can be seen by the public, for example when secured to a flatbed trailer in the course of transportation. As such, the company does not object to the public release of a generic, dimensionless drawing of the outside of the packaging, and I have included a copy of such a drawing with the information submitted to the NRC.
9. The drawing being submitted to the NRC (240116, Rev J) is appropriately labeled as containing proprietary information.
10. The company currently derives revenue from the use of the packaging depicted in the referenced drawing, both in the course of making its own shipments, and from the use of the packaging by others. Although competitors would not be able to fabricate an overpack from the drawing due to regulatory constraints, the information contained in the drawing could be used by competitors to assist their efforts to design and fabricate their own packaging. Such a development would adversely affect the company's business in a material way.