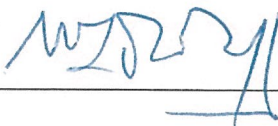


I, William L. Ransohoff, am president of Neutron Products, Inc., and am authorized by the company to request that the NRC withhold from public disclosure certain information provided by Neutron to the Commission.



1 May 2018

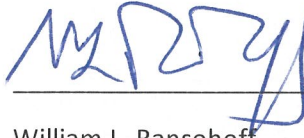
Date

NEUTRON PRODUCTS inc

22301 Mt. Ephraim Road • P. O. Box 68 • Dickerson, Maryland 20842 USA
Telephone: 301-349-5001 • FAX: 301-349-2433 • e-mail: neutronprod@erols.com

AFFIDAVIT

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

A handwritten signature in blue ink, appearing to read 'WLR', is written over a horizontal line.

William L. Ransohoff
Neutron Products, Inc.
President

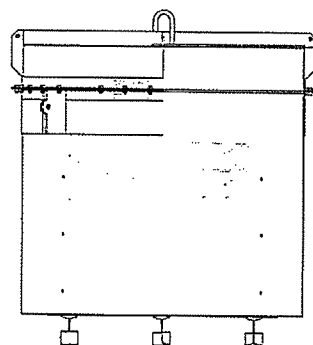
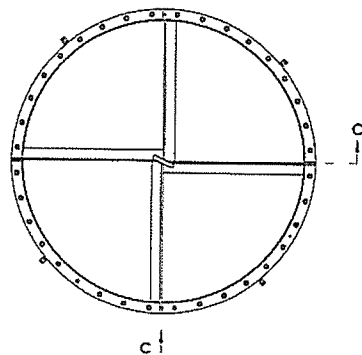
7 MAY 2018

Date

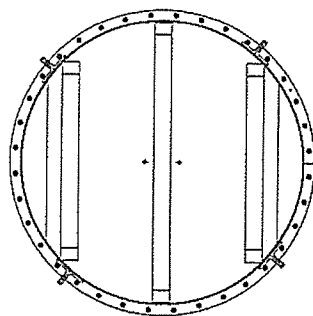
1. I am President of Neutron Products, Inc., and, in that capacity, have a responsibility to protect the company's proprietary information.
2. The intent of this Affidavit is to comply with the provisions of 10 CFR 2.390, Public Inspections, Exemptions, Requests for Withholding, in order that the proprietary 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 documents which we request be withheld from public disclosure are the drawings associated with our Consolidated Application for Renewal of Certificate of Compliance USA/9215/B(U).
5. The drawings show 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 information contained in the drawings.
6. The company has always considered the drawings to be proprietary, confidential information and, as such, the drawings bear 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 drawings are 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 generic, dimensionless drawings, and I have included copies of such drawings with the information submitted to the NRC.
9. The drawings being submitted to the NRC are appropriately labeled as containing proprietary information.
10. The company currently derives revenue from the use of the packaging depicted in the referenced drawings, 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 the packaging 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.



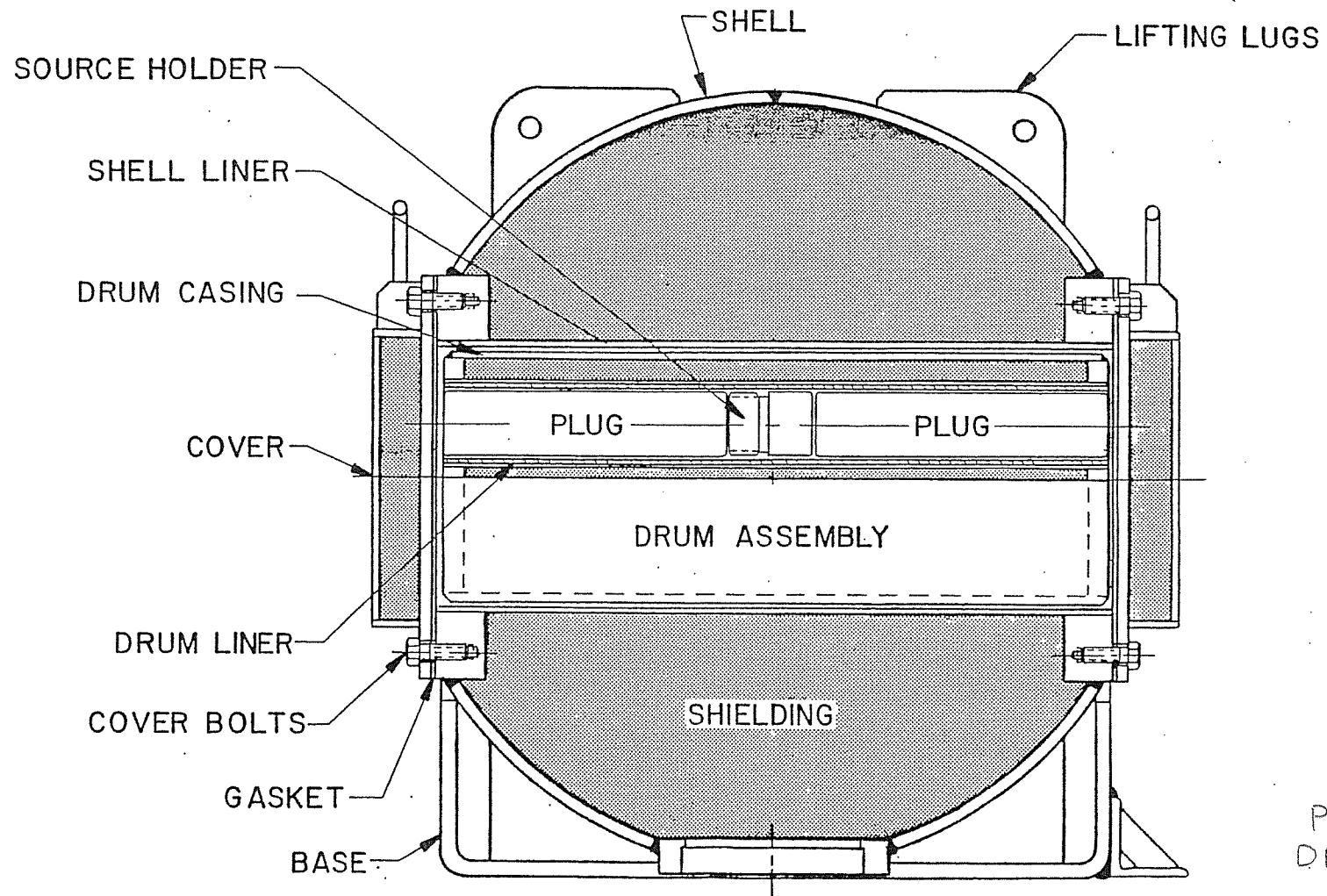
SECTION C-C



STEEL SHELL

PUBLIC
DRAWING

NEUTRON PRODUCTS INC			
OVERPACK	USA/9215	B(U) PACKAGE	
REV	11	DATE	3-10-77



PUBLIC
DRAWING

S/TC INNER CONTAINER STRUCTURAL COMPONENTS