

October 12, 2017

Mr. Richard Boyle  
Director of Hazardous Materials Technology  
PHMSA/Radioactive Materials Branch  
U. S. Department of Transport  
East Building, 2nd Floor, PHH-23, E21-208  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590-0001

Subject: Application for the Revalidation of the Canadian Nuclear Safety  
Commission's Transport Certificate Package Design Approval No.  
CDN/2094/B(U)-96 Revision 1.

Dear Mr. Boyle,

Following up on Michael Conroy's request for redacted documents, please find appended the following redacted documents;

IS/TR 2650 F522, "Engineering Assessment of the Ability of the F-522/UK-201 Type B  
Package to Meet IAEA SSR-6, 2012 Edition"

Appendix 2.1 – Drawing F652201-001

Appendix 2.2 – Drawings F524801-001, IS/SS 1786 F248

Appendix 5 – IN/TR 6061 F522

Appendix 7 – IN/QA 0224 Z000, IN/QA 0562 A000, IS/DS 2651 F522

Appendix 10 – IS/TR 1737 Mo99, IS/TR 2088 Mo99

Appendix 11 – IS/TR 1791 F458

I am also appending an affidavit requesting that this information be withheld from the public domain. As all the documents provided are appendices to the Safety Analysis Report, IS/TR 2650 F522. Nordion believes that the provided affidavit covers all of the documents that have been provided.

If you have any questions or require further information please feel free to contact me by telephone at (613) 592-3400, ext. 2658 or by email at [greg.fulford@nordion.com](mailto:greg.fulford@nordion.com)

Sincerely,



Greg Fulford  
Nuclear Transportation Specialist  
Nordion

Encl.: Documents listed above, Affidavit

# AFFIDAVIT

I, Phil Larabie, in my capacity as Vice President, Medical Isotopes, have been duly authorized to apply for withholding from public disclosure of proprietary information by and on behalf of Nordion (Canada) Inc. "Nordion", do depose and say:

1. I, Phil Larabie, am the Vice-President of Medical Isotopes of Nordion.
2. The information provided in Nordion's submission to the DOT for transport package endorsement, specifically procedures IS/DS 2651 F522, IS/TR 2650 F522 and drawing F652201-001 as well as the responses to the request for additional information is the property of Nordion. These documents contain privileged and confidential information related to the design processes, technical information and procedures of the Medical Isotopes Division of Nordion.
3. Nordion has expended extensive funds and manpower in developing the aforementioned documents and any release or disclosure of information to third parties would enable third parties to use this information to fabricate, use and register similar products while reducing their development risk and cost. This would compromise Nordion's ability to compete in the marketplace. As these documents represent our transport package design and regulatory submission they provide a detailed description of the package, testing and regulatory justifications implemented by Nordion, the entire text of IS/DS 2651 F522, IS/TR 2650 F522, F652201-001 and the responses to the request for additional information should be withheld from public disclosure.
4. The information has been held in confidence by Nordion and any disclosure by Nordion thereof for business purposes, developmental purposes or otherwise has been protected by and accompanied by a confidentiality agreement protecting the trade secrets and proprietary information contained therein.
5. The information is being transmitted to the Nuclear Regulatory Commission of the United States in confidence.
6. This information is not available in public sources.
7. The information contained in this affidavit is, to the best of my knowledge, true and correct.

Sworn before me this 20<sup>th</sup> day of SEPTEMBER, 2017 in the City of Ottawa, Ontario, Canada



Neil Gotfrit

Notary Public in and for the  
Province of Ontario, Canada



Phil Larabie

Vice President, Medical Isotopes,  
Nordion