



May 9, 2019  
NWMI-LTR-2019-007

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

Mr. Michael Balazik  
Research and Test Reactors Branch A  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

**RE: Northwest Medical Isotopes, LLC, Transmittal of NWMI-2019-RPT-001, Geotechnical Exploration, Lot 15, Discovery Ridge, Columbia, Missouri (Docket No. 50-609)**

**Reference:**

1. Construction Permit No. CPMIF-002, *Northwest Medical Isotopes, LLC, Docket No. 50-609 Medical Radioisotope Production Facility Construction Permit*, Docket No. 50-609, dated May 9, 2018.

Dear Mr. Balazik:

Pursuant to the following construction permit condition described in Item G of the Northwest Medical Isotopes, LLC (NWMI) Radioisotope Production Facility Construction Permit (Reference 1), NWMI is submitting our completed geotechnical investigation report NWMI-2019-RPT-001, *Geotechnical Exploration, Lot 15, Discovery Ridge, Columbia, Missouri*.

*G. Prior to the beginning of construction, NWMI shall (a) complete a geotechnical investigation to identify any potential voids that may adversely impact the stability of subsurface materials and foundation, soil and rock characteristics, and liquefaction potential at the site and (b) submit the results of this investigation, including any design changes made to the facility based on the findings of the investigation, in a report to the NRC. This condition terminates once NWMI submits the results of the geotechnical investigation in either this report or as part of its FSAR, whichever occurs first.*

This submission partially fulfills Item G, except for the identification of any design changes based on the findings of the investigation. NWMI is currently completing our facility design; when the design is completed, we will provide a list of design changes affected by this geotechnical investigation. If you have questions, I can be reached at (509) 430-6921 or carolyn.haass@nwmedicalisotopes.com.

I solemnly declare and affirm that the foregoing information is true and correct under the penalty of perjury. Executed on May 9, 2019.

Sincerely,

Carolyn C. Haass  
Chief Operating Officer

ADZO  
NRR

Enclosures

cc: Mr. David Tiktinsky, Office of Nuclear Material Safety and Safeguards



**Attachment 1**

**AFFIDAVIT TO WITHHOLD PROPRIETARY  
INFORMATION FROM PUBLIC DISCLOSURE**

**(PURSUANT TO 10 CFR 2.390)**



**10 CFR 2.390**  
**Affidavit of Carolyn C. Haass**

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

1. I am the Chief Operating 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 document dated April 17, 2019, is proprietary commercial information related to NWMI becoming a domestic supplier of molybdenum-99 (<sup>99</sup>Mo). The proprietary information (NWMI-2019-RPT-001, *Geotechnical Exploration, Lot 15, Discovery Ridge, Columbia, Missouri*, Rev. 0, April 2017) includes sensitive business information created by or for NWMI. This information should be held in confidence by the U.S. Nuclear Regulatory Commission (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 in 10 CFR 2.390(a)(4) for trade secrets and commercial information because:
  - a. This information is owned by NWMI and is considered proprietary.
  - b. 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.
  - c. The information is being transmitted to the NRC voluntarily and in confidence.
  - d. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - e. 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.
  - f. 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 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.

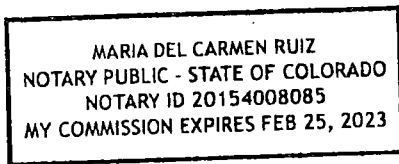


g. NWMI's competitive advantage will be lost if its competitors are able to use the results of NWMI's activities to aid their own commercial activities. The value of this information to NWMI would be lost if the information was disclosed to the public. Making such information available to other entities without them having been required to undertake a similar expenditure of resources would unfairly provide competitors with a significant advantage, and deprive NWMI of the opportunity to exercise its competitive advantage to seek an adequate return on a large investment.

Carolyn C. Haass, Chief Operating Officer

Subscribed and sworn before me, a Notary Public, in and for the State of Colorado, this 9<sup>th</sup> day of May, 2019.

Witness my hand and Notarial Seal.



Notary Public

My commission expires: 2.25.2023

Date