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D. G. Remsley
RONAN

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OCTOBER 30, 1990

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10/16/90

MR. DAVID L. MEYER
CHIEF, REGULATORY PUBLICATIONS BRANCH
DIVISION OF FREEDOM OF INFORMATION AND
PUBLICATIONS SERVICES
OFFICE OF ADMINISTRATION
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555

RE: REQUEST FOR PUBLIC COMMENT

DEAR MR. MEYER:

THE FOLLOWING IS IN RESPONSE TO YOUR LETTER OF OCTOBER 10, 1990:

THE INFORMATION SUBMITTED TO THE NRC AND OTHER REGULATORY AGENCIES IN QUARTERLY REPORTS IS REGARDED BY OUR COMPANY AS CONFIDENTIAL BUSINESS INFORMATION. SINCE THE NRC'S MAIN INTEREST IS IN THE DISPOSITION AND SAFE USE OF SOURCE MATERIAL, WE PRESUME THAT ANY SALES DISTRIBUTION OR OTHER BUSINESS RELATED INFORMATION IS HELD IN CONFIDENCE.

THE FOLLOWING CAN EASILY BE DERIVED FROM THE QUARTERLY REPORT BY A COMPETITOR:

- A. TYPE OF INDUSTRY AND MARKET ACTIVITY.
- B. GEOGRAPHICAL LOCATION OF MARKET ACTIVITY.
- C. COMPETITIVE STANCE OF OUR COMPANY IN A PARTICULAR INDUSTRY OR AREA.
- D. NAME, ADDRESS, AND TELEPHONE OF DIRECT CONTACT AT END USER'S PLANT.
- E. TYPE OF MEASUREMENT APPLICATION AND EQUIPMENT.
- F. AGE AND POSSIBLE CONDITION OF EQUIPMENT.
- G. HISTORY OF OUR COMPANY'S PROGRESS WITH REGARD TO SALES AND NEW PRODUCT OR APPLICATION DEVELOPMENT.
- H. NATURE OF OUR DIRECTION IN SEEKING NEW INDUSTRIES FOR FUTURE BUSINESS.

TO OUR KNOWLEDGE, THE ONLY ITEMS AVAILABLE IN PUBLIC SOURCES ARE THE RECIPIENT'S NAME AND ADDRESS. HOWEVER, THIS IS USELESS UNLESS CONNECTED WITH THE INFORMATION CONTAINED IN THE REST OF THE QUARTERLY REPORT.

RONAN ENGINEERING COMPANY

MEASUREMENTS DIVISION

8050 Production Drive • Florence, Kentucky 41042 • (606) 342-8500 • FAX (606) 342-6426

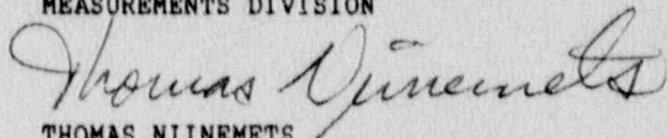
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RONAN PROVIDES ALL SUPPORT SERVICES REQUIRED BY OUR PRODUCT. IT IS THEREFORE ASSUMED THAT ANYONE, WITH THE EXCEPTION OF REGULATORY AGENCIES, SEEKING DISCLOSURE OF OUR DISTRIBUTION ACTIVITIES DOES SO WITH THE SOLE INTENT OF COMPETING DIRECTLY WITH US. THE MAJORITY OF OUR EFFORT AND EXPENSE HAS BEEN, AND IS BEING, EXPENDED ON MARKET RESEARCH FOR DEVELOPMENT OF APPLICATIONS AND ESTABLISHING OF CUSTOMER CONTACTS.

THE ECONOMIC CLIMATE, ALONG WITH RESTRUCTURING AND, IN SOME CASES, SHUTDOWNS IN MANY INDUSTRIES HAS MADE NEW BUSINESS SPARCE. MOST OF THE BUSINESS IS WITH EXISTING USERS OF ISOTOPES IN UPGRADING EXISTING INSTRUMENTATION. WE, AS WELL AS OUR EXISTING COMPETITORS, RELY HEAVILY ON REPEAT SALES TO ESTABLISHED CUSTOMERS IN ORDER TO SUSTAIN OPERATION. IT NORMALLY TAKES A LOT OF EFFORT AND DOLLARS JUST TO DETERMINE WHO OUR NEW CUSTOMERS ARE. IT COST RONAN A SUBSTANTIAL INVESTMENT IN DOLLARS TO GET THE CUSTOMER BASE WE HAVE. WE FEEL THAT DISCLOSURE OF OUR DISTRIBUTION ACTIVITIES TO ANY COMPETITOR NOT ONLY WEAKENS OUR MARKET POSITION BUT JEOPARDIZES OUR SALES POTENTIAL. WE DO NOT WISH TO DISCLOSE ANY INFORMATION CONTAINED IN OUR QUARTERLY REPORTS.

SINCERELY,

RONAN ENGINEERING COMPANY
MEASUREMENTS DIVISION



THOMAS NIINEMETS
PRODUCT MANAGER