



July 13, 1982

Mr. J. M. Felton, Director
Division of Rules and Records
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

RE: FOIA-82-263

Dear Mr. Felton,

This is in response to your letter dated June 30, 1982 concerning Ohmart Corporation quarterly reports listing devices distributed to General Licensees. Replies to your specific questions are shown below.

1. From the inception of the regulation permitting the distribution of gaging devices to general licensees, we have requested that the quarterly reports be withheld from public inspection. We have always marked these reports with the wording "Withhold From Public Inspection". Thus, it has always been our understanding that the reports were received by the NRC in confidence.

2. This information is not available from any public source. In fact, it is not widely distributed within our company. Our sales agents receive information only about customers in their particular geographic area.

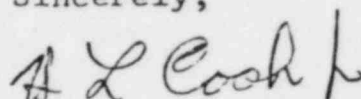
3. Ohmart has always, and will continue to treat these reports as confidential. The reports are a list of the majority of our customers. These sales of gages were achieved through diligent efforts by us to determine the potential markets and then personal contact to explain the benefits of radioisotope gages. Many dollars and much time over the past 30 years has been expended by us to generate the sales listed in the quarterly reports.

4. We feel very strongly that disclosure of the quarterly reports would cause substantial harm to our competitive position. If the quarterly reports were available to competitors, it would eliminate for the competitor the time and effort required to analyze the market and make the personal contact. Also, since many of the older gages are due for replacement or updating, disclosure would provide a competitor with an easy means of locating potential sales.

8210060415 820922
PDR FOIA
COLLINS82-420 PDR

In summary, we consider the complete report proprietary. Even a summary of the reports - such as the total number of gages distributed is proprietary. Ohmart does not authorize the release of any information contained in the quarterly reports; not any part of it, nor a summary.

Sincerely,

A handwritten signature in cursive script that reads "H. L. Cook, Jr." with a vertical line extending from the end of the signature.

H. L. Cook, Jr.
Vice President