

# TIMEX

CORPORATION

WATERBURY, CONN. 06720

May 20, 1982

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ronald Haines  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Haines:

The purpose of this letter is to request that the Commission withhold from the NRC Public Document Room its April 21, 1982 letter and enclosures to the Timex Corporation pursuant to 10 CFR 2.790. We have also attached the affidavit required by the regulation pursuant to this request.

The Notice of Violation which was attached to the Commission's letter of April 21, 1982 established that Timex possessed small quantities of tritium gases authorized under a license which had expired. Timex seeks only to dispose of its existing quantities of these tritium gases and has no intention of acquiring further quantities in the future. Timex has applied for renewal of its expired license in order to accomplish the disposal of the existing laboratory quantities.

Timex respectfully requests that the Notice of Violation and attachments be withheld from the Public Document Room because it regards the possession of the tritium itself as competitively sensitive, and therefore confidential and privileged information under 10 CFR 2.790.

The tritium gases that were the subject of the above violation were at one time evaluated as part of the digital display technology that has been the subject of intense low cost competition in recent years from Hong Kong and Japanese manufacturers. Thus, all research and development efforts by Timex in this area have been regarded as extremely confidential from a marketing/cost standpoint as well as from a technological standpoint.

In response to the Commission's request in Appendix A of its April 21, 1982 letter for a statement of corrective action pursuant to 10 CFR 2.201, Timex has applied for renewal of its expired license in order to dispose of all remaining quantities of the tritium gases in question. Timex is currently awaiting a decision on its application for renewal.

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If the commission should desire further information with regard to this request to withhold information, I would be pleased to coordinate the gathering of such information and respond to the Commission promptly.

Please do not hesitate to call me at 203-573-6374.

Sincerely,

*Paul E. Yestrumskas*

Paul E. Yestrumskas  
Counsel

PEY/dq

Enclosure

