

CAMMENGA AND ASSOCIATES, LLC

2011 BAILEY ST.
DEARBORN, MI 48124
Phone: 313.914.7160
Fax: 313.914.7153
www.cammenga.com

May 5, 2015

ATTN:

Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SS&D License: NR-0210-D-102-E

To Whom It May Concern:

The following is an amendment request for the SS&D license NR-0210-D-102-E. Cammenga & Associates, LLC would like to amend its AF Series device based on the enclosed information. We have included an affidavit requesting this information to be withheld from public record.

Any questions you may have can be directed to me at the above phone number.

Sincerely,



Christopher (CJ) Karchon
Director of Strategic Initiatives
CAMMENGA AND ASSOCIATES, LLC



CAMMENGA COMPANY, LLC
2011 BAILEY ST.
DEARBORN, MI 48124
Phone: 313.914.7160
www.cammenga.com

AFFIDAVIT

STATE OF MICHIGAN)
)
COUNTY OF WAYNE)

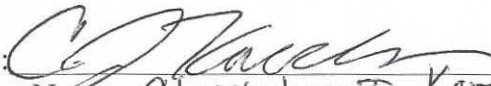
1. I, Christopher J. Karchon, am the Vice President of Sales for Cammenga Company, LLC ("Cammenga"). Accordingly, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure, which is provided in Cammenga's "Application for Withholding" attached as Exhibit A to this Affidavit (the "Proprietary Information"), and I am vested with the authority to apply for such withholding on Cammenga's behalf.
2. I am knowledgeable of the principles and procedures applied by Cammenga in determining the proprietary nature of Cammenga's methodologies and concepts, and as such, categorize the Proprietary Information as trade secret and commercial or financial information.
3. Cammenga is submitting the attached request for withholding proprietary information in reliance on public disclosure exemptions provided by the Trade Secrets Act, 18 USC § 1905, and NRC Regulations, 10 CFR §§ 2.309(a)(4) and 9.17(a)(4).
4. Cammenga utilized the following criteria in determining that the Proprietary Information is proprietary to Cammenga:
 - i. The Proprietary Information reveals the distinguishing aspects of a process, component, or method whose unlicensed use by any of Cammenga's competitors would constitute a competitive economic advantage over other companies.
 - ii. The Proprietary Information consists of supporting data, including test data, relative to a process, component, structure or method, the application of which secures a competitive position for Cammenga, including product optimization.
 - iii. A competitor's use of the Proprietary Information would reduce such competitor's expenditure of resources, or improve its competitive position, in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.

- iv. The Proprietary Information includes information regarding Cammenga's private partnerships, collaborations, supply and customer base, the application of which safeguards a competitive position for Cammenga, including entry into new markets.
5. In accordance with 10 CFR § 2.309(b)(4), the following identify the reasons to withhold the Proprietary Information from public disclosure.
- i. The Proprietary Information is the property of Cammenga and has not been made available to the public. The Proprietary Information has been held in confidence by Cammenga since its inception and continues to remain confidential.
 - ii. The Proprietary Information is of a type customarily held in confidence by Cammenga.
 - a. The Proprietary Information constitutes a "Trade Secret" under the Michigan Uniform Trade Secrets Act, MCL §§ 445.1901-445.1910, *et seq.*, because it:
 - 1. Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use, and
 - 2. Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.
 - b. There is a rational basis in which Cammenga deems such information as proprietary, and thus, not made available for public disclosure. Strict compliance with Cammenga's confidentiality policy safeguards sensitive information, which in turn, affords Cammenga a competitive advantage in its market.
 - 1. I, Christopher J. Karchon have the ultimate say in what information is deemed to be proprietary. This is determined based on the criteria set forth in section 4 and 5 of this document. The only individuals who have seen this information either are employed by Cammenga, or are outside suppliers who have signed non-disclosure agreements.
 - iii. The Proprietary Information is being transmitted to the U.S. Nuclear Regulatory Commission by Cammenga in confidence, and it is to be received in confidence by the Commission pursuant to 10 CFR § 2.309(b)(4).
 - iv. The Proprietary Information is neither available in public sources nor generally known in the public domain. After careful and extensive research, Cammenga

found no comparable methodologies or patentable processes. Thereafter, Cammenga classified its developments as trade secrets and held the Proprietary Information as proprietary and as trade secret.

- v. Public disclosure of the Proprietary Information is highly likely to cause substantial harm to Cammenga's competitive position because it will permit competitors to create similar products and either reduce or foreclose future business opportunities.
 - a. The proprietary information embedded in the product's design is essential to yield a competitive advantage in the Military and Tactical marketplace. The information is extremely valuable to Cammenga as it has invested a substantial amount of time, effort, and resources in engineering the methodology critical to assembling the Proprietary Information. Cammenga's dedication to research, development, and NRC review costs were incumbent to the advancement of the Proprietary Information's process and analytics.
 - b. Public disclosure of the Proprietary Information will afford competitors the opportunity to take advantage of the technology developed and optimized by Cammenga without proportionate expenditure. The only method to duplicate equivalent proprietary information is to devote considerable employee manpower and resources to research and development. Publication of the Proprietary Information would provide a windfall to Cammenga's competitors by foregoing the requisite investment to reproduce Cammenga's analytic processes while reducing Cammenga's competitive advantage.
- 6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

CAMMENGA COMPANY, LLC

By: 
Print Name: Christopher J. Karchon
Title: VP of Sales

Subscribed and sworn to before me

on this 5th day of May, 2015.

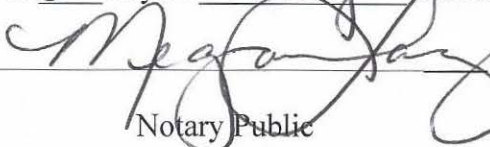

Notary Public



EXHIBIT A

(~~Proprietary Information~~)

The following sections from the package submitted to the NRC on May 5, 2015 should be withheld as proprietary:

- NRC Form 313
- Form 313 answers to 5 – 11
- Discussion of Changes
- Cammenga and Associates, LLC SS&D License # NR-0210-D-102-E
- Cammenga & Associates, LLC E-License # 21-26460-03E

NRC FORM 313

(3-2009)

10 CFR 30, 32, 33,
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 3/31/2012

APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION.
SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

OFFICE OF FEDERAL & STATE MATERIALS AND
ENVIRONMENTAL MANAGEMENT PROGRAMS
DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA,
KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY,
NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH
CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,
SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND
APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,
UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
612 E. LAMAR BOULEVARD, SUITE 400
ARLINGTON, TX 76011-4125

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED
MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

☐

A. NEW LICENSE

☒B. AMENDMENT TO LICENSE NUMBER NR-0210-D-102-E☐

C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

2011 Bailey St.
Dearborn, MI 48124

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Same as Box 2.

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Christopher J. Karchon

TELEPHONE NUMBER

(313) 914-7160

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount
which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR
TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY NAAMOUNT
ENCLOSED

\$ 0.00

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING
UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN
CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND
CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO
ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Christopher J. Karchon, Director of Strategic Initiatives

SIGNATURE



DATE

05/05/2015

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		

APPROVED BY

DATE

CAMMENGA AND ASSOCIATES, LLC

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DEARBORN, MI 48124
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www.cammenga.com

May 5, 2015

FORM 313 Items 5 – 11

Items 5 - 11 are not applicable, as there is no change in radioactive material, purpose of the licensed material, to individuals responsible for the radiation program, to facilities/equipment, to the safety program, or waste management guidelines.

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May 5, 2015

DISCUSSION OF CHANGES

Cammenga and Associates, LLC would like to make the below changes to its AF Series in Sealed Source & Device license NR-0210-D-102-E. These changes allow for more flexibility in manufacturing consistent high quality parts with proper labeling of each unit. Please refer to Docket # 030-38679 for further information on this series. There are no requested changes to the maximum activity allowed per device or the annual quantity of H-3 in possession.

SS&D NR-0210-D-102-E:

- A. The first line of the second page should be edited as follows: "The AF Series gun sights are constructed of ~~carbon~~ **titanium, aluminum, or similar materials** and are designed to hold tritium (H-3) glass vials manufactured by mb-microtech with model number 400/1."
- B. The table for dimension ranges should be adjusted to reflect the dimensions below:

FRONT SIGHTS		
(mm)	MAX	MIN
L	19	5
W	16	2
H	60	5

REAR SIGHTS		
(mm)	MAX	MIN
L	40	6
W	25	8
H	18	6

- C. The fourth paragraph should be edited as follows: "A laser engraved/**etched, stamped, machined, molded, cast, or durable paint label will be placed** on the lateral surface of the gun sight contains the appropriate information in accordance with 10 CFR 32.25 (b). The ~~engraved~~ label contains the branding name (Snake Eyes); "DH3", "DR-H3", ~~or~~ "DRH3", **or "H3"** to indicate the presence of tritium (H-3); and the exempt distribution license number 21-26460-03E **and/or Cammenga's name/logo will be etched located** on the underside of every side sight."

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee 1. Cammenga & Associates, LLC 2. 2011 Bailey Street Dearborn, Michigan 48124		In accordance with application dated July 10, 2014 3. License number 21-26460-03E is amended in its entirety to read as follows: 4. Expiration date September 30, 2023 5. Docket No. 030-38679 Reference Nos. 030-33020, 21-26460-02E	
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	
A. Hydrogen 3	A. Glass Sealed Vials (MB Microtec Models 400/6, 400/3, and 400/1)	A. Not applicable (See Condition 11)	
9. Authorized use: In accordance with Section 32.22, 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material," the licensee is authorized to distribute self-luminous compasses and knives models manufactured, in accordance with NRC Sealed Source and Device Registration (SSDR) No. NR-0210-D-101-E; and gun sight manufactured in accordance with SSDR No. NR-0210-D-102-E containing sealed sources as specified in Condition 10 of this license to persons exempt from the requirements for a license pursuant to 10 CFR Part 30.19, or equivalent provisions of any Agreement State.			

CONDITIONS

10. The following self-luminous products may be distributed pursuant to this license provided the amount of hydrogen-3 contained in each device does not exceed the amount specified:

<u>Device Model</u>	<u>Maximum Activity per Device</u>
3H Series Compass	120 mCi (4.44 GBq)
J582T Compass	15 mCi (555 MBq)
3H-Tritium Series Knife	200 mCi (7.40 GBq)
D3-T Destinate Compass	115 mCi (4.26 GBq)
AF Series Gun Sights	60 mCi (2.22 GBq) Rear; 30 mCi (1.11 GBq) Front

11. This license does not authorize possession or use of licensed material.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**License Number
21-26460-03EDocket or Reference Number
030-38679

12. Notwithstanding the labeling requirements in 10 CFR 32.22(a) for identifying the manufacturer on devices, the licensee may use product bearing labels referring to License No. 21-26460-02E (expired) until March 31, 2014. All products distributed after March 31, 2014, shall bear a label listing the current License No. 21-26460-03E which has superseded the expired license.
13. The licensee may distribute only from its facility located at 2011 Bailey Street, Dearborn, Michigan.
14. The licensee shall file periodic reports as specified in 10 CFR 32.25.
15. Except as specifically provided otherwise by this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated August 13, 2013 (ML13231A305);
 - B. Letter dated September 6, 2013 (ML13259A286);
 - C. Letter dated July 10, 2014 (ML14197A670).

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: November 5, 2014By: 

Shirley S. Xu
Material Safety Licensing Branch
Division of Materials Safety, States, Tribal and
Rulemaking Program
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES
SAFETY EVALUATION OF DEVICE

NO.: NR-0210-D-102-E

DATE: November 5, 2014

PAGE: 1 OF 3

DEVICE TYPE: Gun Sights

MODEL: AF Series

MANUFACTURER/DISTRIBUTOR:

Cammenga and Associates, LLC
2011 Bailey Street
Dearborn, MI 48124

SEALED SOURCE MODEL DESIGNATION:

mb/Microtec:
400/1

ISOTOPE:

Hydrogen-3

Hydrogen-3

MAXIMUM ACTIVITY:

60 mCi (2.22 GBq) Rear sight

30 mCi (1.11 GBq) Front Sight

LEAK TEST FREQUENCY:

Not Required

PRINCIPAL USE:

(W) - Self Luminous
Applications

CUSTOM DEVICE:

_____ YES _____ X _____ NO

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES
SAFETY EVALUATION OF DEVICE

NO.: NR-0210-D-102-E

DATE: November 5, 2014

PAGE: 2 OF 3

DEVICE TYPE: Gun Sights

DESCRIPTION:

The AF Series gun sights are constructed of carbon steel and are designed to hold tritium (H-3) glass vials manufactured by mb-microtech with model number 400/1. The overall dimensions of the gun sights in the AF Series are listed below:

	Front Sights		Rear Sights	
	max (mm)	min (mm)	max (mm)	min (mm)
Length	19	15	28	6
Width	16	3	22	16
Height	10	5	18	12

The gun sights are designed to withstand the conditions that may be experienced during the normal and severe conditions of handling, storage, and use. The borosilicate glass vials containing tritium gas are protected by a permanent aluminum outer sleeve. The glass vials are then secured in the machined cavities of the carbon steel gun sights with silicone glue. Front sights contain one tritium source and the rear sights contain two tritium sources. See attachment 1 and 2.

The manufacturer stated that the expected working life for the gun sights is 10 years.

A laser engraved label on the lateral surface of the gun sight contains the appropriate information in accordance with 10 CFR 32.25(b). The engraved label contains the branding name (Snake Eyes); "DH3", "DR-H3", or "DRH3" to indicate the presence of tritium (H-3); and the exempt distribution license number 21-26460-03E will be etched on the underside of every side.

Cammenga and Associates, LLC has submitted a quality assurance and control (QA/QC) program that has been found to be acceptable by NRC for production and distribution of AF Series gun sights. A copy of this program is on file with the NRC.

Based on our review of the information and test data provided by

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES
SAFETY EVALUATION OF DEVICE

NO.: NR-0210-D-102-E

DATE: November 5, 2014

PAGE: 3 OF 3

DEVICE TYPE: Gun Sights

DESCRIPTION (Cont.):

the manufacturer, the NRC concludes that Cammenga and Associates LLC's AF Series gun sights meet the safety criteria set forth in 10 CFR 32.23. Therefore, the NRC concludes that the AF Series gun sights are acceptable for exempt distribution.


REFERENCES:

The following supporting documents for the AF Series gun sights are hereby incorporated by reference and are made part of this registry document.

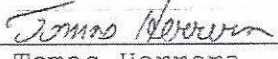
- Cammenga and Associates, LLC's application letter dated July 10, 2014 with enclosures thereto.
- Cammenga and Associates, LLC's letters dated October 9, 2014 with enclosures thereto.
- Cammenga and Associates, LLC's e-mail dated October 30, 2014, with enclosures thereto.

ISSUING AGENCY:

Date: November 5, 2014

Reviewer: 
Lymari Sepulveda

Date: NOVEMBER 5, 2014

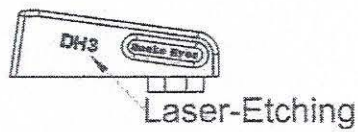
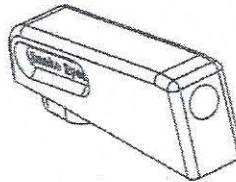
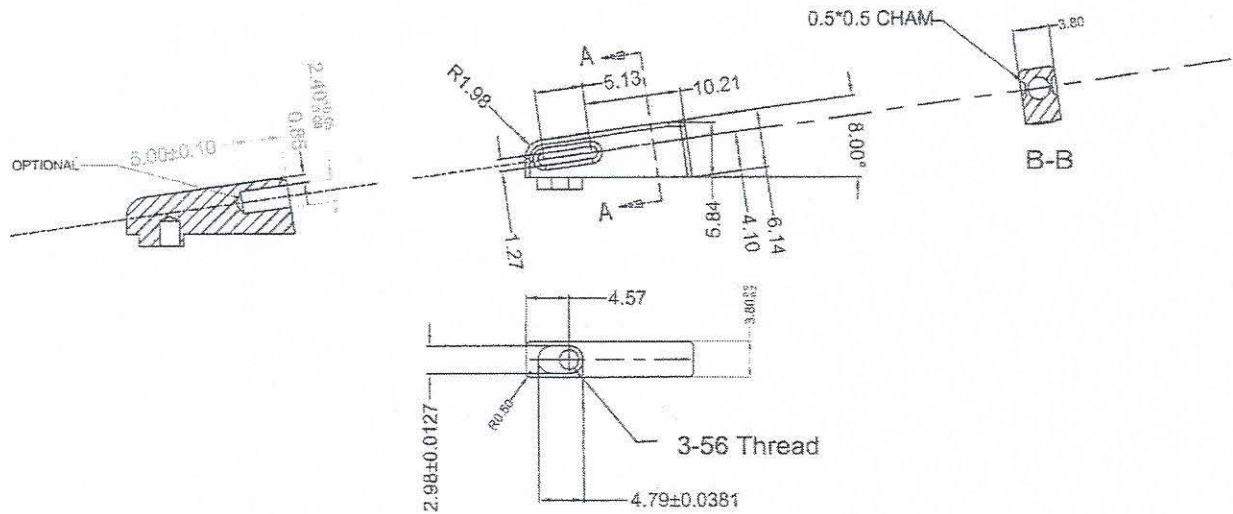
Reviewer: 
Tomas Herrera

REGISTRY OF RADIOACTIVE SEALED SOURCES AND DEVICES
SAFETY EVALUATION OF DEVICE

NO.: NR-0210-D-102-E

DATE:

ATTACHMENT: 2 OF 2



Front Sights Model representation
(one tritium source per front sight)