

July 21, 2015

Mr. Michael Anderson, President  
Aerotest Operations, Inc.  
3455 Fostoria Way  
San Ramon, CA 94583

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE  
FOR AEROTEST OPERATIONS, INC., NOTICE OF PROOF OF FINANCIAL  
PROTECTION PURSUANT TO 10 CFR 140.17(b) (TAC NO. MF6254)

Dear Mr. Anderson:

By letter dated May 6, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15134A143), Aerotest Operations, Inc., submitted an affidavit dated May 4, 2015 (ADAMS Accession No. ML15134A145), executed by yourself, which requested that information contained in the following document be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.390:

Enclosure 1, Business Confidential Financial Statements, Withhold from Public  
Disclosure Pursuant to 10 CFR 2.390 (ADAMS Accession No. ML15134A144)

The affidavit stated that pursuant to 10 CFR 2.390, Public Exemptions, Request for Withholding, Aerotest Operations, Inc. (Aerotest), and Autoliv ASP, Inc. ("Autoliv ASP"), hereby requests that certain information contained in their Notice of Proof of Financial Protection pursuant to 10 CFR 140.17(b) be withheld from public disclosure, as such information contains commercial and financial information which is Business Proprietary.

In support of your request, you stated the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

1. The information sought to be withheld from public disclosure is financial statements included in Enclosure 1 to the Notice of Proof of Financial Protection Pursuant to 10 C.F.R. §140.17(b) ("Notice") marked as Business Confidential.
2. The person making this request is Michael S. Anderson of Autoliv ASP and Aerotest.
3. The basis for proposing that the information be withheld from public disclosure is the information marked as Business Confidential is confidential business and financial information of Autoliv ASP, which information has been held in confidence by Autoliv ASP, is a type customarily held in confidence, is not available in public sources, and if publicly disclosed would be likely to cause substantial harm to competitive position of Autoliv ASP taking into account the value of the information, the amount of effort and money expended by Autoliv ASP in developing the information and the difficulty with which the information could be acquired or duplicated by others;

4. If such information were disclosed to the public, Autoliv ASP believes that competitive harm would result;
5. Enclosure (1) to the Notice has been marked to show the location of the information sought to be withheld.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your submittal in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, has determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and (d)(1), as well as Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at (301) 415-3965.

Sincerely,

**/RA/**

Spyros A. Traiforos, Project Manager  
Research and Test Reactors Licensing Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Docket No. 50-228

cc: See next page

Aerotest Operations, Inc.

Docket No. 50-228

cc:

Sandy Warren, General Manager  
Aerotest Operations, Inc.  
3455 Fostoria Way  
San Ramon, CA 94583

California Energy Commission  
1516 Ninth Street, MS-34  
Sacramento, CA 95814

Radiologic Health Branch  
P.O. Box 997414, MS 7610  
Sacramento, CA 95899-7414

Test, Research, and Training  
Reactor Newsletter  
University of Florida  
202 Nuclear Sciences Center  
Gainesville, FL 32611

Kimberly Harshaw  
Pillsbury Winthrop Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037-1122

Jay Silberg  
Pillsbury Winthrop Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037-1122

4. If such information were disclosed to the public, Autoliv ASP believes that competitive harm would result;
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**ADAMS Accession No: ML15198A481**

**NRR-106**

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