

**AFFIDAVIT OF PATRICK KEOUGH PURSUANT TO 10 CFR 2.390**

STATE OF NORTH CAROLINA    )  
  )  
COUNTY OF ALAMANCE        )

I, Patrick Keough, being duly sworn, state as follows:

**BACKGROUND**

1. My name is Patrick Keough. I am above the age of 18, and I am competent to testify to the matters stated herein. I make this Affidavit pursuant to 10 CFR 2.390(a)(4) and in connection with Walter Kidde Portable Equipment, Inc.'s ("Kidde") request to amend its license 32-23858-01E with the United States Nuclear Regulatory Commission ("Amendment Request").
2. I declare under penalty of perjury under the laws of the United States that the facts contained herein are true and correct to the best of my knowledge.
3. Kidde seeks for pages 22, 23, 25 and 26 of its Amendment Request to be exempt from public disclosure per 10 CFR 2.390. Pages 22, 23, 25 and 26 of Kidde's Amendment Request are referred to in this document as the "Requested Pages".

For ease of reference, the remainder of this affidavit is numbered to track the requirements of 10 CFR 2.390.

(b)(ii)

(A) The Requested Pages contain confidential trade secrets and confidential commercial information and therefore should be exempt from public disclosure.

(B) I am the Radiation Safety Officer and Logistics Manager for Kidde in Mebane, North Carolina. I have been specifically delegated the function of reviewing the information

sought to be withheld from public disclosure and authorized to apply for its withholding on Kidde's behalf.

(C) Kidde requests that the Requested Pages be considered exempt from disclosure pursuant to 10 CFR 2.390(a)(4).

(D) Harm would result if the Requested Pages are disclosed to the public. The drawings on those pages constitute Kidde's guarded manufacturing secrets and would cause substantial harm to Kidde's competitive position if disclosed.

(E) The Amendment Request, including the Requested Pages, resides with the NRC.

(b)(4)

(i) Kidde holds the Requested Pages and their included drawings in confidence.

(ii) The information contained in the Requested Pages is of a type customarily held in confidence by its owner.

(iii) The Requested Pages were transmitted to and received by the Commission in confidence.

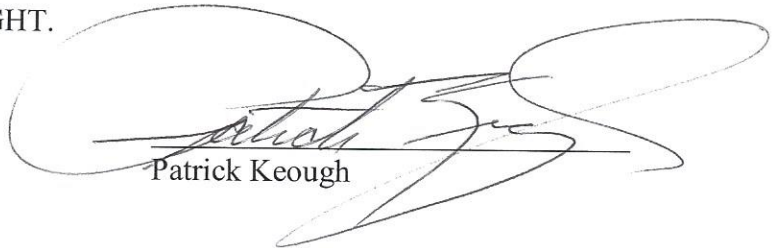
(iv) The Requested Pages are not available in public sources.

(v) Public disclosure of the Requested Pages would likely cause substantial harm to Kidde's competitive position, taking into account the value of the information to Kidde; the amount of effort or money expended by Kidde to develop the information; and the difficulty with which the information could be properly acquired or duplicated by others. If such information was available to competitors without their having been required to undertake a similar expenditure of resources, the disclosure would unfairly provide

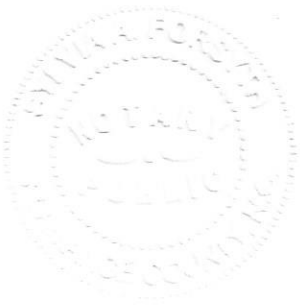
competitors with a windfall and deprive Kidde of the opportunity to seek an adequate return on its large investment in developing and designing its products.

FURTHER AFFIANT SAYETH NAUGHT.

08-12-2015  
Date

  
Patrick Keough

Sworn and subscribed before me this 12<sup>th</sup> day of August, 2015



  
NOTARY PUBLIC

My Commission Expires.

March 20, 2020