



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

August 19, 2019

Cammenga and Associates, LLC  
ATTN: Christopher Karchon  
Director of Strategic Initiatives  
2011 Bailey St.  
Dearborn, MI 48124

**SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION PARTIAL APPROVAL OF  
CAMMENGA AND ASSOCIATES, LLC REQUEST FOR WITHHOLDING  
INFORMATION FROM PUBLIC DISCLOSURE**

Dear Mr. Karchon:

Cammenga and Associates, LLC (Cammenga) submitted an affidavit dated March 2, 2019, executed by Misato Morioka, requesting that the information provided in application dated March 1, 2019, to amend Sealed Source and Device registration certificate NR-0210-D-102-E and Exempt Distribution License 21-26460-03E, be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390.

The affidavit stated that per §2.390(b)(4), Cammenga is requesting that all of the information be withheld from public disclosure for the following reasons: (1) 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; (2) the proprietary information is of a type customarily held in confidence by Cammenga; (3) 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; and (4) 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.

Accordingly, we have concluded that most of the information sought to be withheld from public disclosure does not meet the requirements of 10 CFR 9.17 and 10 CFR 2.390. Therefore, your request to withhold the information in Exhibit A in your application dated March 1, 2019, in its entirety is denied. However, the drawings marked proprietary for the SAFE Series, will be withheld from public disclosure pursuant to 10 CFR 9.17 and 10 CFR Paragraph 2.390(a)(4) and 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 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 U.S. Nuclear Regulatory Commission (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 of the date of public disclosure, in advance which will be a reasonable time thereafter.

If you have any questions, please contact me at [Celimar.Valentin-Rodriguez@nrc.gov](mailto:Celimar.Valentin-Rodriguez@nrc.gov) or (301) 415-7124.

Sincerely,

**/RA/**

Celimar Valentin-Rodriguez, Ph.D.  
Materials Safety and Tribal Liaison Branch  
Division of Materials Safety, Security, State  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

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DATED: August 19, 2019

**ADAMS Accession No.: ML19231A195**

<b>OFC</b>	NMSS/MSTB	NMSS/MSTB	NMSS/MSTB
<b>NAME</b>	CValentin-Rodriguez	MArribas-Colon	CValentin-Rodriguez
<b>DATE</b>	8/19/19	8/19/19	8/19/19

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