



**ANALYSIS AND MEASUREMENT SERVICES CORPORATION**

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June 4, 2021

**AFFIDAVIT**

**STATE OF TENNESSEE  
COUNTY OF KNOX**

1. I, H.M. Hashemian, am an officer of Analysis and Measurement Services Corporation (AMS) and familiar with the criteria that is applied to determine whether certain AMS information is proprietary. I am familiar with the policies established by AMS to ensure the proper application of these criteria.
2. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," AMS requests withholding from public disclosure of the documents listed in Table 1, which is attached to this affidavit. The documents contain research, development, application, product design details, and process qualification information related to the AMS online monitoring methodology. AMS has expended a significant amount of money and effort involving numerous contractors over more than 30 years to develop this product.
3. As required by 10 CFR 2.390, AMS has included in attached Table 1 the following information:
  - Identity of the document or part sought to be withheld;
  - Declaration of the basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a);
  - Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public; and
  - Locations in the documents of all information sought to be withheld.
4. As required in § 2.390(b)(4), AMS wishes to note that the request for withholding from public disclosure applies to pages that contain commercially sensitive information that AMS normally discloses only under a Non-Disclosure Agreement (NDA). This commercially sensitive information is not available in public sources and is the type of information customarily held in confidence by AMS and our competitors. Some examples of categories of information which fit into the definition of proprietary information are:
  - a) Information which discloses process, method, or apparatus, including supporting data and analyses, where prevention of its use by AMS's competitors without license or contract

from AMS constitutes a competitive, economic advantage over other companies in the industry.

- b) Information, which if used by competitors, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, application, installation, assurance of quality, or licensing of a similar-product.
- c) Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of AMS, its customers, its partners, or its suppliers.
- d) Information which reveals aspects of past, present, or future AMS customer-funded development plans or programs, of potential commercial value to AMS.
- e) Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.
- f) Information obtained through AMS actions which could reveal additional insights into nuclear equipment qualification processes, customer applications, and regulatory proceedings, and which are not otherwise readily obtainable by a competitor.

- 5. AMS is transmitting this information to NRC in confidence.
- 6. As noted in attached Table 1, release of this information in a public forum could cause harm to AMS by revealing trade secrets and/or commercially sensitive design and operational details and technical processes related to designing, building, and/or implementing the AMS online monitoring methodology.
- 7. As AMS President and Chief Executive Officer, I am authorized to apply for its withholding on behalf of AMS.
- 8. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



H.M. Hashemian, Ph.D.

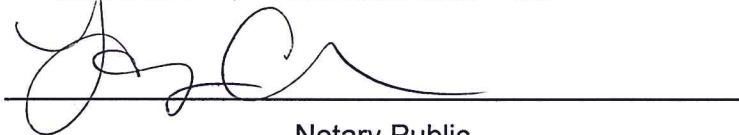
President and Chief Executive Officer

Analysis and Measurement Services Corporation

Knoxville, Tennessee, 37923

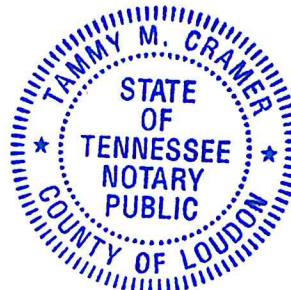
Sworn to and subscribed before me

this 4<sup>th</sup> day of June, 2021



Notary Public

My commission expires: 1/13/2025



**Table 1. Documents requested for withholding from public disclosure**

June 4, 2021

Document Title	Part of document sought to be withheld from public disclosure	Basis for proposing the information be withheld, encompassing considerations set forth in § 2.390(a)	Specific statement of the harm that would result if the information sought to be withheld is disclosed to the public
AMS-TR-0720R1-A-DRAFT Dated May 2021	Portions of Chapters 11, 14, and 15 as marked by brackets [ [ ] ]. (see Note 1)	Trade secrets and / or commercial information as per § 2.390(a)(4)	<p>AMS would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it would enable competitors to make direct comparisons between aspects of their online monitoring technology and the corresponding details for the AMS methodology.</p> <p>Chapters 11, 14, and 15: AMS would be harmed by disclosure of its proprietary technical processes for the development and implementation of its online monitoring methodology. These processes underpin the integrity of measuring and test equipment used to implement its online monitoring methodology, which are an important competitive advantage for AMS.</p> <p>AMS would be harmed by disclosure of commercially sensitive details of how the online monitoring methodology is implemented. This would be of value to a competitor in understanding specific competitive design and operational characteristics of the online monitoring methodology.</p> <p>AMS would be harmed by disclosure of the identified commercially sensitive information, which is of value to a competitor because it defines the specific methods used by AMS to qualify and validate the online monitoring methodology, which would enable competitors to duplicate the process without having to perform the associated research and development.</p>

**Notes:**

- (1) As required in NRC Regulatory Information Summary (RIS) 2014-01, documents containing proprietary information are marked with the word "Proprietary" at the top of the first page of the document and at the top of each page containing such information. In these proprietary documents, brackets (" [ [ ] ] ") denote proprietary information. In the proprietary document, the two brackets denoting the end of a proprietary segment of a report may appear one or more pages following the bracket indicating the start of the proprietary segment. In a nonproprietary edition of a proprietary document, the material within the brackets is removed.