

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re: Petition by Zetec, Inc. for *Inter Parties* Review of U.S. Patent no. 6,823,269

DECLARATION OF SEAN P. SULLIVAN

I, SEAN P. SULLIVAN , hereby declare that:

1. I am a technical officer/scientist, currently employed by Ontario Power Generation in Inspection and Maintenance Services.

2. I have been involved in the inspection of power generation equipment including heat exchangers since the early 1990s.

3. I am the co-author along with V. S. Cecco of the presentation paper titled “Eddy Current Performance Demonstration for CANDU Steam Generators,” which was given at the ISG-TIP-2 Task Coordinating Group Meeting at the Argonne National Laboratory in Lamont, Illinois on October 19-23, 1998. The Argonne National Laboratory is operated by the United States Department of Energy and conducts research in the area of Nuclear Power Generation. Copies of the Cecco/Sullivan paper would have been distributed to attendees and companies and institutions that paid to participate in the Argonne ISG-TIP program. Examples would include: The United States Nuclear Regulatory Commission; Electronic Power Research Institute (EPRI); Westinghouse Electric Company; The Canadian Atomic Energy Control Board, now called the Canadian Nuclear Safety Commission; Canadian CANDU Owners (Ontario Hydro, Hydro Quebec, New Brunswick Power, Atomic Energy of Canada Limited (AECL)),and Korean nuclear industry institutions.

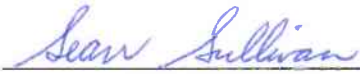
4. I am also the author of a March 1999 report titled “Guidelines for Qualifying Eddy Current Technology for CANDU Steam Generator Tube Inspection.” The report was distributed by Atomic Energy of Canada Ltd. The report has a document number, COG-98-371-I. The suffix

Declaration of Sean P. Sullivan

“T” designates the report as one which is to be made available to industry and is not restricted as to access.

5. I further declare that all statements made herein of my own knowledge are true, and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine and/or imprisonment under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issuing therefrom.

Date: Dec. 17, 2013


Sean P. Sullivan