

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 and the use of eddy current non-destructive flaw detection since the early 1990s.

3. I am the author of a March 1999 report titled "Guidelines for Qualifying Eddy Current Technology for CANDU Steam Generator Tube Inspection."

4. The report was initially distributed by Atomic Energy of Canada Ltd. to the list of recipients on page 12, all of whom were involved in the nuclear power industry and had reason to be interested in the testing of Steam Generator Tubes used in the industry.

5. The report has a document number, COG-98-371-I. COG stands for CANDU Owners Group. The suffix "I" designates the report as one which is available to industry and which is not restricted as to its access. As a general matter, COG documents were restricted within the COG group, however, documents such as this one were not restricted so that interested parties outside of the COG group would also have access to them. This access was important for this document because the information was useful for practitioners in the testing field and those on the program committee for whom I prepared the document wanted broad access to information that would advance reactor safety.

6. 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

Declaration of Sean P. Sullivan

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: November 17, 2014

Sean P. Sullivan
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