

KONECRANES®

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Konecranes Nuclear Equipment & Services
5300 S. Emmer Drive, New Berlin, WI 53151
P 262.364.5700 F 262.364.5701

Date: November 8, 2017

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Cc: Chief, Quality Assurance Vendor Inspection Branch-2, Division of Construction Inspection and Operational Programs, Office of New Reactors.

Enclosures: Affidavit to support request to withhold proprietary information based on previous information furnished per October 18, 2017. Cover letter also enclosed herein.

Reply to a Notice of Nonconformance-Additional Information furnished as planned to support final review and closure of Nonconformance 99901451/2017-201-01

Konecranes Nuclear Equipment & Services, LLC (KNES) is pleased to furnish the enclosed affidavit to support our request to withhold proprietary information.

Sincerely
Konecranes Nuclear Equipment & services, LLC



Tom McCann
Global Director of Nuclear Quality

IED9
NRD

AFFIDAVIT PURSUANT TO 10CFR 2.390

Konecranes Nuclear Equipment and Services, LLC.
State of Wisconsin
County of Waukesha

I, Jay Douglas Edmundson, depose and say that I am a Vice President of Konecranes Nuclear Equipment and Services, LLC., duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is listed below:

- Calculation #36676-01 – Main Hoist Reeving Calculation, Rev. 07
- Calculation #36676-26 – Auxiliary Hoist Reeving Calculation, Rev. 05
- Sections of APS Letter to NRC, specifically the Nylatron® description letter

These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Konecranes Nuclear Equipment and Services, LLC in designating information as a trade secret, privileged, or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission ' s regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

1) The information sought to be withheld from public disclosure involves specific design details which are owned and have been held in confidence by Konecranes Nuclear Equipment and Services, LLC. including but not limited to:

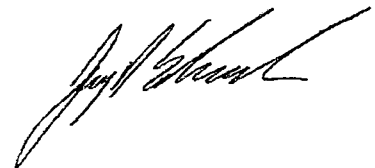
- All information on how we use the Nylatron® sheaves and the research/calculations we have developed to show they are acceptable.
- The hydraulic upper block that is used for our energy absorption system to prevent two-blocking events. This patented assembly is very unique in the industry and separates us from our competitors. This unique system is being considered for the new era of cranes in Europe and is very valuable to us.
- Design of the drum and other trolley components to reduce weight and maximize the strength of the material to distributing our loadings without creating high stress areas.

- Use of the Magnatorque® for emergency lowering and providing additional breaking in the drive train.
- The specialty Python® wire rope we use and the subsequent calculations which provides us a weight and reduction in drum/sheave size advantage to our competitors.
- Where we source our hooks and the subsequent calculations which provides us a weight and price advantage to our competitors.

2) The information is of a type customarily held in confidence by Konecranes Nuclear Equipment and Services, LLC. and not customarily disclosed to the public. Konecranes Nuclear Equipment and Services, LLC. has a rational basis for determining the types of information customarily held in confidence by our corporation.

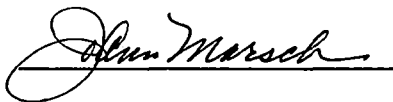
3) Public disclosure of the information is likely to cause substantial harm to the competitive position of Konecranes Nuclear Equipment and Services, LLC. because the information consists of descriptions of the design and analysis of a Single Failure Proof crane with special weight considerations, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Konecranes Nuclear Equipment and Services, LLC., take marketing or other actions to improve their product's position or impair the position of Konecranes Nuclear Equipment and Services, LLC.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.

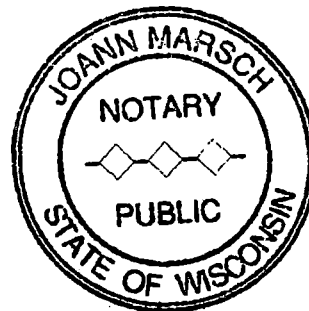


Jay D. Edmundson, P.E.
Vice President of Engineering

Subscribed and sworn before me this 1st day of November, 2017



Notary Public
My Commission Expires: 12-16-17



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5300 S. Emmer Drive, New Berlin, WI 53151
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Date: October 18, 2017

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Cc: Chief, Quality Assurance Vendor Inspection Branch-2, Division of Construction Inspection and Operational Programs, Office of New Reactors.

This letter serves as the Konecranes Nuclear Equipment & Services, LLC (KNES) Reply to a Notice of Nonconformance-Additional Information furnished as planned to support final review and closure of Nonconformance 99901451/2017-201-01

Reference: Inspection Report No. 99901451/2017-201

Enclosures: Customer Acceptance Letter and Calculations as follows:

1. Customer Acceptance letter: AI 17-14312-01 dated 10/12/2017 with attachments
There are (2) complete proprietary copies for NRC view only, and (2) **bracketed** public view copies with proprietary information removed.

2. Palo Verde Nuclear Generating Station-APS Aux Hoist Reeving Calculations Rev. 05 dated September 28, 2017.
There are (2) complete proprietary copies for NRC view only, and (2) **bracketed** public view copies with proprietary information removed.

2. Palo Verde Nuclear Generating Station-APS Main Hoist Reeving Calculations Rev. 07 dated September 28, 2017.
There are (2) complete proprietary copies for NRC view only, and (2) **bracketed** public view copies with proprietary information removed.

Konecranes Nuclear Equipment & Services, LLC (KNES) is pleased to furnish the enclosed objective evidence to the NRC in accordance with our corrective action response plan, and feel confident that the review of this information by the NRC will result in the acceptance of our response and ultimate closure of this nonconformance.

Sincerely
Konecranes Nuclear Equipment & services, LLC



Tom McCann
Global Director of Nuclear Quality