



October 8, 1982

Mr. Cecil Thomas  
Chief, Standardization and Special Projects Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Proposed Revision to Generic Licensing Topical Report  
EDR-1 (P)-A Ederer's Nuclear Safety Related  
eXtra-Safety And Monitoring (X-SAM) Cranes,  
Request for Approval of

Dear Mr. Thomas:

Mr. Robert L. Baer's letters of January 2, 1980 and February 7, 1980 provided the NRC's acceptance of Revision 1 of the Topical Report EDR-1, "Ederer's Nuclear Safety-Related (X-SAM) Cranes." Specifically, EDR-1 was accepted for use in crane systems for nuclear power plants, subject to issue of a revision that incorporated the changes identified in an October 23, 1979 Ederer letter. Accordingly, Revision 2 of the Topical Report, dated 2/15/80, was issued to incorporate the identified changes. The requisite number of copies of Revision 2 of EDR-1 was submitted to the NRC by a March 28, 1980 Ederer letter.

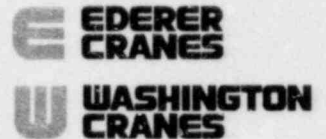
Revision 3 to EDR-1 has been prepared in accordance with the NRC's instructions contained in NUREG-0390 in order to keep it up to date. In particular, since NRC acceptance of EDR-1 in 1980, Ederer has developed a Compact X-SAM Hoist, which has essentially the same design features as the cranes described in EDR-1. However, some of the design details described in EDR-1 Revision 2 had to change to make the Compact X-SAM Hoist practical. Therefore, a revision of EDR-1 is necessary. To aid the NRC's review, a change summary sheet identifies the changes that have been made, along with the reasons for making them. Changes in the topical report are marked in the right margin of all sections with the exceptions of Appendices G and H, which are entirely new.

Wisconsin Electric has already purchased a retrofit trolley for its Point Beach Auxiliary Building that will be based upon the changes described in Revision 3 of EDR-1. In addition Ederer has submitted a bid to Texas Utilities Generating Company to supply three compact X-SAM Hoists for its Comanche Peak Station in accordance with Revision 3 of EDR-1. Since TUGCO previously purchased a nuclear safety related X-SAM crane from Ederer, we are optimistic about receiving an order for these hoists.

This topical report still contains a large amount of proprietary information. Therefore, a non-proprietary version has been prepared. The proprietary information is marked with a dotted line in the left margin. An affidavit, together with justification for withholding the proprietary version from public disclosure, has been prepared in accordance with 10 CFR 2.790 (b). This affidavit is attached to this letter.

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In accordance with the instructions of NUREG-0390, twenty five (25) copies of the revised pages of the proprietary revision are being submitted. Upon NRC acceptance of Revision 3, we will submit the number of complete copies specified by NUREG-0390 of both the proprietary report and the non-proprietary report.

The NRC's approval of Revision 3 of Generic Licensing Topical Report EDR-1 is hereby requested. Please do not hesitate to contact us if you have any questions regarding this letter or its attachments.

Very truly yours,

Ederer Incorporated

A handwritten signature in cursive script, appearing to read 'C. William Clark, Jr.', is written over the typed name.

C. William Clark, Jr.  
Director of Engineering

Attachments:

Change Summary Sheet  
Affidavat  
25 copies of revised pages of EDR-1(P) Revision 3 10/8/82

EDERER INCORPORATED

AFFIDAVIT

I, C. William Clark, Jr., being duly sworn, depose and state as follows:

1. I am the Director of Engineering of Ederer Incorporated, herein and hereafter referred to as Ederer, and have been delegated the function of reviewing the information described in Paragraph 2 which is sought to be withheld and have been authorized to apply for its withholding.
2. The information sought to be withheld consists of designated pages of a revision to a Licensing Topical Report, EDR-1(P), Revision 3, dated October 8, 1982, which describes Ederer's Nuclear Safety Related X-SAM Cranes.
3. In designating material as proprietary, Ederer utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

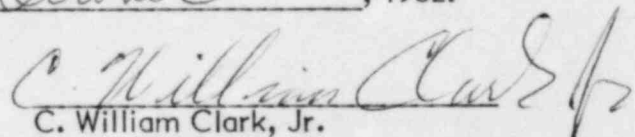
"A trade secret may consist of any formula, pattern, device, or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it . . . . A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information . . . . Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
  - a. Information that discloses a process, method, or apparatus where prevention of its use by Ederer's competitors without license from Ederer constitutes a competitive economic advantage over other companies;
  - b. Information consisting of supporting data and analyses, including test data, relative to a process, method, or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
  - c. Information which if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
  - d. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

5. The procedure for approval of external release of such a document is review by the President and Director of Engineering for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside Ederer are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees only in accordance with appropriate regulatory provisions or proprietary agreements.
6. The document mentioned in Paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by Ederer.
7. The information sought to be withheld consists of the designated pages of the topical report, including those of its appendicies. These pages reveal Ederer's design methods and apparatus for meeting certain NRC safety requirements, and disclose analysis methods and results regarding X-SAM Cranes' performance during certain accidents, all with particular reference to the unique characteristics of Ederer's design. As such this information is of important competitive commercial value.
8. The information sought to be withheld, to the best of my knowledge and belief, has consistently been held in confidence by Ederer Incorporated, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
9. Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of Ederer and deprive or reduce the availability of profit making opportunities because disclosure could enable competitors to obtain a better understanding of our product and programs and utilize this information so as to adversely impact on our sales.

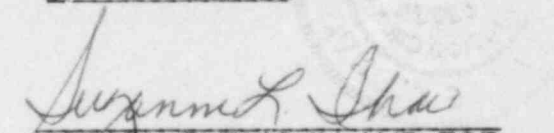
C. William Clark, Jr., being duly sworn, deposes and says that he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at Seattle, Washington this 8<sup>th</sup> of October, 1982.

  
 C. William Clark, Jr.  
 Ederer Incorporated

STATE OF WASHINGTON )  
 COUNTY OF KING ) ss:

Subscribed and sworn before me this 8<sup>th</sup> day of October, 1982.

  
 NOTARY PUBLIC IN AND FOR  
 SAID COUNTY AND STATE  
 residing at Seattle



**CHANGE SHEET FOR  
REVISION 3 of EDR-I**

1. The applicability of EDR-I has been extended to compact hoists, such as underhung monorail hoists, by including the following special features that make a compact single-failure-proof hoist practical:
  - a. A totally mechanical Emergency Drum Brake Actuator and its companion Drive Train Continuity Detector. (Appendix G)
  - b. A continuously engaged Emergency Drum Brake and its intergal Drive Train Continuity Detector. (Appendix H)
  - c. Use of a single holding brake on the high speed shaft.
  - d. Line speeds above 50 FPM at the Hoist Drum.
  - e. Alternate Hydraulic Load Equalizer Design.
2. The general descriptive material has been revised to reflect the following characteristics of the new types of Emergency Drum Brakes and their associated Drive Train Continuity Detectors:
  - a. The Emergency Drum Brake does not set when power is removed.
  - b. The Emergency Drum Brake always sets if the load lowers if there is a discontinuity in the drive train or there is an error signal.
  - c. The Emergency Drum Brake is capable of lowering the load without power continuously throughout the full hook travel, but not necessarily at the design rated speed.
3. The following miscellaneous changes have been made keep EDR-I current:
  - a. A refined EATL design has been added as an alternative to the original design.
  - b. Additional information has been included in Appendix B and C to reflect the data that was included in the Fort Calhoun X-SAM Crane Licensing Submittal to the NRC dated May 19, 1980.
  - c. The sample Critical Items List has been updated to reflect other parts of the revision and recently issued Critical Items Lists for Nuclear Safety Related X-SAM Cranes.
  - d. A key operated reset switch has been added as an alternative to a locked panel for restricting restart of the hoist following serious incidents.
  - e. The accident analysis submittal to the applicant has been simplified to include only the maximum kinetic energy and maximum load motion, since these results are the only ones required to verify compliance with the criteria established by Appendices B and C.
  - f. More of the report has been made non-proprietary in light of recent public disclosures by Ederer.