

# SIEMENS

proj. 702

January 13, 2000  
NRC:00:004

Document Control Desk  
ATTN: Chief, Planning, Program and Management Support Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

## Additional Information In Support of the TELEPERM™ XS Review

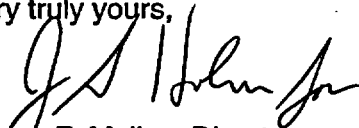
This letter provides additional information to support the NRC's review of the TELEPERM™ XS system. This additional information consists of various software development documentation packages which were reviewed by a member of the NRC staff at the Siemens offices in Germany and a document demonstrating a Typical Diversity and Defense-in-Depth Assessment. Specifically, the following documents are enclosed:

- Documentation for Modification Request 200.
- Documentation for Modification Request 203.
- KWU NLL5/1997/016, "TXS – Development Documentation Version 2.01 of Function Block 2.MIN."
- EMF-2340(P) Revision 0, "Siemens Power Corporation Typical Diversity and Defense-in-Depth Assessment in Accordance with the Methodology of EMF-2267(P)."

A copy of these documents has been sent directly to the lead NRC reviewer, Mr. Hulbert C. Li.

Siemens Power Corporation considers all of this material to be proprietary. As required by 10 CFR 2.790(b), an affidavit is enclosed to support the withholding of this information from public disclosure.

Very truly yours,



James F. Mallay, Director  
Regulatory Affairs

/arn

Enclosures

cc: N. Kalyanam E. C. Marinos  
H. C. Li (w/Enclosures) M. E. Waterman

DOS6

Siemens Power Corporation

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**AFFIDAVIT**

STATE OF WASHINGTON    )  
                                      ) ss.  
COUNTY OF BENTON     )

1. My name is Jerry S. Holm. I am Manager, Product Licensing, for Siemens Power Corporation ("SPC"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by SPC to determine whether certain SPC information is proprietary. I am familiar with the policies established by SPC to ensure the proper application of these criteria.

3. I am familiar with the SPC information transmitted by letter NRC:00:004 and referred to herein as "Documents." Information contained in these Documents has been classified by SPC as proprietary in accordance with the policies established by SPC for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by SPC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Documents be withheld from public disclosure.

**6. The following criteria are customarily applied by SPC to determine whether information should be classified as proprietary:**

- (a) The information reveals details of SPC's research and development plans and programs or their results.**
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.**
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for SPC.**
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for SPC in product optimization or marketability.**
- (e) The information is vital to a competitive advantage held by SPC, would be helpful to competitors to SPC, and would likely cause substantial harm to the competitive position of SPC.**

**7. In accordance with SPC's policies governing the protection and control of information, proprietary information contained in these Documents has been made available, on a limited basis, to others outside SPC only as required and under suitable agreement providing for nondisclosure and limited use of the information.**

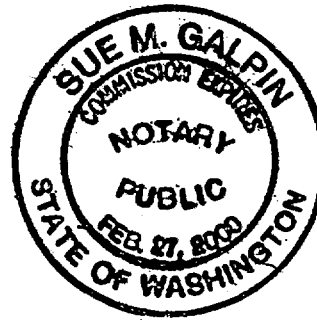
**8. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.**

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Jerald S. Holm

SUBSCRIBED before me this 13<sup>th</sup>  
day of January, 2000.

Sue M. Galpin



Sue M. Galpin  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 02/27/00