SIEMENS

January 19, 2000 NRC:00:007

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

Ref.: 1. Letter, J. F. Mallay (SPC) to Document Control Desk (NRC), "Submittal of EMF-2110(NP) Revision 1, TELEPERM XS: A Digital Reactor Protection System," NRC:99:036, September 1, 1999.

This letter provides additional information to support the NRC's review of the TELEPERM™ XS system. This additional information consists of two test reports and a summary report that compares certain qualification testing results with two EPRI reports. The two test reports were developed by TUV (Technical Inspection Agency) Nord and TUV Rheinland in Germany and have been translated into English by Siemens. Specifically, the following documents are enclosed:

- Summary Test Report for Type Test of Modules in TELEPERM XS, TUV Nord, March 18, 1998.
- Documentation of the Practical Test Overview of Test Documentation Summary of Test Results of the TELEPERM XS System, TUV Rheinland, March 18, 1998.
- EMF-2352(NP) Revision 0, "TELEPERM™ XS Qualification Testing," Siemens Power Corporation, January 2000.

Copies of these documents have been sent directly to the two NRC reviewers involved in this aspect of the evaluation of the TELEPERM XS topical report (see Reference 1).

Siemens Power Corporation considers the two TUV test reports 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

Enclosures

cc: N. Kal

N. Kalyanam E. J. Lee (w/Enclosures) E. C. Marinos M. E. Waterman

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AFFIDAVIT

| STATE OF WASHINGTON |) | |
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| COUNTY OF BENTON |) | |

- 1. My name is James F. Mallay. I am Director, Regulatory Affairs, 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:00:007 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.

Jones melly

SUBSCRIBED before me this 19th

day of January, 2000.

Sue M. Galpin

NOTARY PUBLIC, STATE OF WASHINGTON

MY COMMISSION EXPIRES: 02/27/00

