

proj. 702



January 25, 2000
NRC:00:008

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

Clarification of Selected Design Aspects of the TELEPERM™ XS System

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.

During the completion of its review of the TELEPERM XS topical report (Reference 1), the NRC asked that Siemens Power Corporation provide clarifying statements regarding certain design aspects of this digital I&C system. The attachment to this letter provides the requested clarifications and related qualification plans.

The attachment includes four topics:

- The commercial dedication of the system support controller chip, whose design is based on application specific integrated circuit technology.
- The qualification of an AC/DC power supply.
- Isolation devices between 1E and non-1E systems and their qualification.
- Response time verification for the analog input module.

SPC believes this attachment is fully responsive to all outstanding NRC inquiries concerning the design of the TELEPERM XS digital I&C system.

Siemens Power Corporation considers the attachment to this letter 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

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

* TELEPERM is a trademark of Siemens.

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A F F I D A V I T

STATE OF WASHINGTON)
) ss.
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:00:008 and referred to herein as "Document." Information contained in this Document 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. This Document contains 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 this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Document 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 this Document 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.

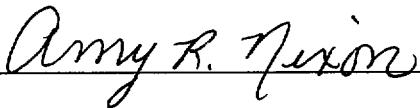
8. SPC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

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



SUBSCRIBED before me this 25th
day of January, 2000.





Amy R. Nixon
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 12/06/03