

SIEMENS

March 3, 2000
NRC:00:017

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

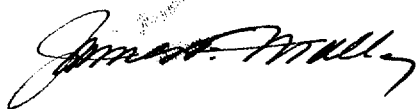
Clarification of EMF-2341(P), "Generic Strategy for Periodic Surveillance Testing of TELEPERM™ XS Systems in U.S. Nuclear Generating Stations"

During discussions between the NRC and Siemens Power Corporation concerning the review of SPC's TELEPERM™ XS topical report, the NRC requested that a portion of EMF-2341 be clarified. This letter includes two attachments that provide the needed clarification. The first attachment explains the need for the clarification, and the second is a replacement page for the EMF-2341 report.

Siemens Power Corporation considers some of the information contained in the attachments 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.

A copy of this letter has been sent directly to the lead reviewer, Hulbert C. Li.

Very truly yours,



James F. Mallay, Director
Regulatory Affairs

/arn

Attachments

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

* TELEPERM is a trademark of Siemens.

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The NRC and Siemens Power Corporation agreed that a clarification is needed to statements made on page v of EMF-2341(P), "Generic Strategy for Periodic Surveillance Testing of TELEPERM XS Systems in U.S. Nuclear Generating Stations," December 1999. Accordingly, this page has been revised to clarify SPC's position regarding recommended periodic surveillance test requirements for TELEPERM XS applications. The original issue of this report (revision 0) stated that "comprehensive and wide-ranging online diagnostic checks (i.e., the FEPROM CRC checks) preclude the need for periodic Logic System Functional Testing." This original statement is ambiguous and needs to be restated to clarify SPC's intent.

Page v has been changed to make the meaning of the above quote more understandable. The revision explains that these comprehensive diagnostic checks (cyclic self-monitoring and startup self-test) satisfy the requirement for periodic surveillance test of the TXS installed application and system software. This position is consistent with the understandings reached during meetings between the NRC and SPC in November 1999.

A copy of the revised page v to EMF-2341(P) is enclosed as Attachment 2. This new page changes the report itself, which is now designated as revision 1, dated March 2000. No other changes to the report were made, except on the document revision page to indicate that page v has been revised.

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.

[Handwritten Signature]

SUBSCRIBED before me this 3rd
day of March, 2000.



Amy R. Nixon

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