


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

January 23, 2008

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Jeffrey A. Ciocco

Project No.0751
MHI Ref: UAP-HF-08030

Subject: Transmittal of the Calculation Book and Input Deck of Full Height 1/2 Scale Test Analysis on Advanced Accumulator for WCOBRA/TRAC and M-RELAP5.

With this letter, Mitsubishi Heavy Industries, LTD. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) a set of documents entitled "Calculation Book and Input Deck of Full Height 1/2 Scale Test Analysis on Advanced Accumulator for WCOBRA/TRAC and M-RELAP5 (UAP-HKS-L0022)" in response to the NRC's request in the telephone conference held on September 25, 2007. MHI also transmits the related data file in a CD. In the enclosed documents and text files of the input deck ("bc_case1_pd_wct.txt" for WCOBRA/TRAC and "case1.k0.0.i" for M-RELAP5), MHI provides the advanced accumulator test analysis information related to MHI topical reports "MUAP-07011-P (R0) and MUAP-07013-P(R0)" to aid the NRC in performing similar analyses using TRACE code. We wish to point out that some Chinese and Japanese characters are contained in the enclosed material, since some portions of this document are extracted from MHI's internal design documents. However, this will not impair the NRC's intended use of the materials.

As indicated in the enclosed materials, both the enclosed documents (Enclosure 2) and the enclosed compact disc (Enclosure 3) contain information that MHI considers proprietary, and therefore should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 C.F.R § 9.17 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. In addition, this letter encloses an Affidavit of Masahiko Kaneda (Enclosure 1) which identifies the reasons why MHI respectfully requests that all materials provided in Enclosure 2 and Enclosure 3, and designated as Proprietary, be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 C.F.R.§ 9.17(a)(4).

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of the submittals. His contact information is below.

Sincerely,

M. Kaneda

Masahiko Kaneda,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

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Enclosures:

Enclosure1 - Affidavit of Masahiko Kaneda (non-proprietary)

Enclosure2 - Calculation Book and Input Deck of Full Height 1/2 Scale Test Analysis on
Advanced Accumulator for WCOBRA/TRAC and M-RELAP5 (UAP-HKS-L0022)
(proprietary)

Enclosure3 – CD: "bc_case1_pd_wct.txt (135kB), case1.k0.0.i (4kB)" (proprietary)

CC: L. J. Burkhart

J. W. Chung

S. R. Monarque

C. K. Paulson

Contact Information

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MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Masahiko Kaneda, state as follows:

1. I am General Manager, APWR Promoting Department, of Mitsubishi Heavy Industries, LTD ("MHI"), and have been delegated the function of reviewing MHI's US-APWR documentation to determine whether it contains information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 C.F.R. § 9.17(a)(4) as trade secrets and commercial or financial information which is privileged or confidential.
2. In accordance with my responsibilities, I have reviewed the enclosed document dated January 17, 2008, entitled "Calculation Book and Input Deck of Full Height 1/2 Scale Test Analysis on Advanced Accumulator for WCOBRA/TRAC and M-RELAP5" and the enclosed data files and have determined that the document and files contain proprietary information that should be withheld from public disclosure.
3. The information identified as proprietary in the enclosed document and files has in the past been, and will continue to be, held in confidence by MHI and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
4. The basis for holding the referenced information confidential is that it describes the unique information concerning the safety analysis, developed by MHI and not used in the exact form by any of MHI's competitors. This information was developed at significant cost to MHI, since it required the performance of Research and Development and detailed design for its software and hardware extending over several years.
5. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of information to the NRC staff.
6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. Other than through the provisions in paragraph 3 above, MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.
7. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without incurring the costs or risks associated with the design of the subject systems. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MHI in the U.S. nuclear plant market:

- A. Loss of competitive advantage due to the costs associated with development of

the Safety Analysis. Providing public access to such information permits competitors to duplicate or mimic the Thermal Design without incurring the associated costs.

- B. Loss of competitive advantage of the US-APWR created by benefits of enhanced plant safety, and reduced operation and maintenance costs associated with the Safety Analysis.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Executed on this 23rd day of January, 2008.



Masahiko Kaneda,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.