MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

February 27, 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-08041

Subject: Transmittal of the Technical Report "Subcompartment Analyses for US-APWR Design Confirmation" (MUAP-07031)

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the technical report "Subcompartment Analyses for US-APWR Design Confirmation". This Report supplements the materials provided in the "Design Control Document for the US-APWR" ("DCD"), and is incorporated by reference in the DCD. The Report is being submitted electronically in compact discs (CDs). Submittal of the enclosed technical report was one of the commitments made at the time MHI filed its application for NRC certification of the US-APWR design. See December 31, 2007 letter to NRC (MHI Ref: UAP-HF-07170), Enclosure 2.

The enclosed report contains information that MHI considers proprietary, and therefore the report should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 CFR § 9.17(a)(4) as trade secrets and commercial or financial information which is privileged or confidential. Accordingly, the Report is being submitted in two versions, in separate compact discs. One version (in CD 1) contains the complete proprietary version of the Report. A non-proprietary version of the Report is enclosed in CD 2. In the non-proprietary version, the proprietary information, bracketed in the proprietary version, is replaced by the designation "[ ]". In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the proprietary version of the Report should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 CFR § 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 this submittal. His contact information is provided below.

Sincerely,

M. Kaneda

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

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NRO

Enclosures:

1. Affidavit of Masahiko Kaneda

2. CD 1: "Subcompartment Analyses for US-APWR Design Confirmation" – Version containing Proprietary information

3. CD 2: "Subcompartment Analyses for US-APWR Design Confirmation" – Version not containing Proprietary information

The files contained in each CD are listed in Attachments 1 and 2 hereto.

CC: L. J. Burkhart
J. W. Chung
S. R. Monarque
C. K. Paulson

Contact Information
C. Keith Paulson, Senior Technical Manager
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ENCLOSURE 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

	)
In the Matter of	)
MITSUBISHI HEAVY INDUSTRIES, LTD.	)
US-APWR	)
Standard Plant Design Certification Application	)
	)

AFFIDAVIT OF MASAHIKO KANEDA

I, Masahiko Kaneda, being duly sworn according to law, depose and 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 disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) and 10 CFR § 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 "Subcompartment Analyses for US-APWR Design Confirmation" and have determined that portions of the report contain proprietary information that should be withheld from public disclosure. Those pages containing proprietary information are identified with the label "Proprietary" on the top of the page and the proprietary information has been bracketed with an open and closed bracket as shown here "[ ]". The first page of the technical report indicates that all information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a).

3. The information in the report identified as proprietary by MHI 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 design of 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 the performance of detailed hardware design and software development 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 supporting the NRC staff's review of MHI's Application for certification of its US-APWR Standard Plant Design.

6. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without the costs or risks associated with the design of the subject structures. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI in the U.S. nuclear

plant market.

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 27th day of February, 2008.

M. Kaneda

Masahiko Kaneda

ATTACHMENT 1

FILES CONTAINED IN CD 1

CD 1: "Subcompartment Analyses for US-APWR Design Confirmation" – Version containing Proprietary information

Contents of CD

File Name	Size	Sensitivity Level
001 Subcompartment Analyses (Proprietary).pdf	4.2MB	Proprietary

ATTACHMENT 2

FILES CONTAINED IN CD 2

CD 2: "Subcompartment Analyses for US-APWR Design Confirmation" – Version non containing Proprietary information

Contents of CD

File Name	Size	Sensitivity Level
001 Subcompartment Analyses (Non-proprietary).pdf	3.8MB	Non-Proprietary