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TOKYO, JAPAN

March 21, 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-08056

Subject: Response to NRC's Question on the Seismic Qualification of Electrical and Mechanical Equipment

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the documents entitled "MHI's Response to the NRC's Question on the Seismic Qualification of Electrical and Mechanical Equipment". In the enclosed document, MHI provides response to NRC's question to support the NRC's acceptance review of the US-APWR Design Certification Application.

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,



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

Enclosures:

Enclosure1 - MHI's response to NRC's question on the seismic qualification of mechanical and electrical equipment

CC: L. J. Burkhart
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Enclosure 1

US-APWR

**MHI's Response to NRC's Question
on the Seismic Qualification
of Electrical and Mechanical Equipment**

March 2008

MHI's Response to NRC's Question on the Seismic Qualification of Electrical and Mechanical Equipment

March 2008

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INTRODUCTION

This report documents MHI's response to NRC's question on the seismic qualification of mechanical and electrical equipment as provided for in Section 3.10 on Chapter 3 of the US-APWR Design Certification Application.

NRC QUESTION:

The US-APWR Design Control Document (DCD) states in the second paragraph on page 3.10-3 that the "method of qualification of safety-related seismic category I equipment using experience data is not used in the DCD." But the DCD then goes on to state that this method "is an optional method that can be used after the DCD by the COL Applicant." The DCD also states that if this method is "used by the COL Applicant, it is to be documented in the equipment qualification file (and EQSDS) and readily available for review." The NRC also noted that page 3.10-6 provides that qualification of equipment "through the use of experience data" is an "optional" method for the seismic qualification of the US-APWR equipment and that a COL information item 3.10(4) is provided on page 3.10-19 for a COL applicant who chooses to use experience data to seismically qualify equipment.

The NRC specifically wants to know whether MHI is going to use experience data to seismically qualify electrical and mechanical equipment.

MHI RESPONSE:

MHI is not going to use experience data to seismically qualify electrical and mechanical equipment. Also the US-APWR DCD will be modified to eliminate the option of a COL applicant to use experience data for the seismic qualification of equipment. Specifically, the language on Pages 3.10-3, 3.10-6, and 3.10-19 of the DCD will be changed so that a COL applicant is not allowed the option of using experience data. Furthermore, the seismic qualification of electrical and mechanical equipment will be addressed comprehensively in the Technical Report of Environmental Qualification Program to be submitted in December 2008 as described in "Enclosure 2 US-APWR Submittal Plan" attached to MHI letter (MHI Ref: UAP-HF-07170) dated December 31, 2007.