MITSUBISHI HEAVY INDUSTRIES, LTD.
16-5, KONAN 2-CHOME, MINATO-KU
TOKYO, JAPAN

May 16, 2008

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

Attention: Mr. Jeffrey A. Ciocco,

Docket No. 52-021
MHI Ref: UAP-HF-08088

Subject: MHI's Response to US-APWR DCD RAI No.2

References: 1) "Request for Additional Information No. 2 Revision 0, SRP Section 19 - Probabilistic Risk Assessment and Severe Accidents Application: Section 19.2", dated April 17, 2008.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Response to Request for Additional Information No.2 Revision 0".

Enclosed is the response to an RAI that is contained within Reference 1.

As indicated in the enclosed materials, this document contains 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. A non-proprietary version of the document is also being submitted with the information identified as proprietary redacted and replaced by the designation "[ ]".

This letter includes a copy of the proprietary version (Enclosure 2), a copy of the non-proprietary version (Enclosure 3), and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests that all materials designated as "Proprietary" in Enclosure 2 be withheld from public 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 provided below.

Sincerely,

Yoshiki Ogata,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

D081
NRO

Enclosures:

1. Affidavit of Yoshiki Ogata

2. Response to Request for Additional Information No. 2 Revision 0 (proprietary)

3. Response to Request for Additional Information No. 2 Revision 0 (non-proprietary)

Attachment to Enclosure 2: CD 1 "MAAP input model". The files contained in CD 1 are listed in Attachment 1 hereto.

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

Contact Information
C. Keith Paulson, Senior Technical Manager
Mitsubishi Nuclear Energy Systems, Inc.
300 Oxford Drive, Suite 301
Monroeville, PA 15146
E-mail: ck_paulson@mnes-us.com
Telephone: (412) 373-6466

ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-08088

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, 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 entitled "Response to Request for Additional Information No.2 Revision 0" dated May, 2008, and have determined that all data in the document are proprietary information that should be withheld from public disclosure. Whole information should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

3. The information identified as proprietary in the enclosed document 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 the computational modeling of the plant design is achieved by applying highly comprehensive engineering skills, which distinguish the MHI's advantage in the nuclear industry.

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 improvement of highly engineered skill.

   B. Loss of competitive advantage of the US-APWR created by benefits from the

computational modeling.

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 16th day of May 2008.

Yoshiki Ogata,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

Enclosure 3

UAP-HF-08088
Docket Number 52-021

Response to Request for Additional Information No.2 Revision 0

May, 2008
(Non-Proprietary)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

5/16/2008

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No.52-021

RAI NO.: **NO.2 REVISION 0**

SRP SECTION: **19 – Probabilistic Risk Assessment and Severe Accident Evaluation**

APPLICATION SECTION: **19.2**

DATE OF RAI ISSUE: **4/17/2008**

QUESTION NO. : 01-1

Please provide the APWR MAAP4.0.6 input model (parameter file) used in the severe accident progression analysis (MUAP-07030(R0)). The NRC staff needs this design data to perform its confirmatory calculations using MELCOR.

ANSWER:

MHI provides [ ]

Impact on DCD

There is no impact on DCD from this RAI and the response as this submission of the MAAP input model files does not cause any change to the descriptions of DCD.

Impact on COLA

There is no impact on COLA from this RAI and the response as this submission of the MAAP input model files does not cause any change to the descriptions of COLA.

Impact on PRA

There is no impact on PRA from this RAI and the response as this submission of the MAAP input model files does not cause any change to the results of PRA.

Attachments:

Docket No. 52-021
MHI Ref: UAP-HF-08088

ATTACHMENT TO ENCLOSURE 2

FILES CONTAINED IN CD 1

CD 1: "MAAP input model"
– Version containing Proprietary Information

Contents of CD

File Name	Size	Sensitivity Level
001 **USAP_v10_nT.PAR**	1.2 MB	Proprietary
002 **usap_0923.inc**	14 KB	Proprietary