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

July 14th, 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-08123

Subject: Additional Information for Design Completion Plan of US-APWR Piping Systems and Components

References: 1) Letter MHI Ref: UAP-HF-08080 from Y. Ogata (MHI) to U.S. NRC, "Additional Information for NRC Review Schedule for US-APWR Design Certification Application" dated on April 16, 2008.
2) Letter MHI Ref: UAP-HF-08121 from Y. Ogata (MHI) to U.S. NRC, "Submittal of Requested Information for Future QA Inspection Activities" dated on July 1, 2008.

On April 15, 2008, Mitsubishi Heavy Industries, Ltd. ("MHI") presented to the U.S. Nuclear Regulatory Commission ("NRC") the schedule for the submittal of the stress analysis technical reports for the US-APWR Piping Systems and Components ("PSC") and completion of the stress analyses for NRC audit. In addition, MHI formally committed to this schedule by letter on April 16, 2008 (Reference 1).

At the April 15 public meeting, the NRC outlined its expectations for the contents of the technical reports and stress analyses and requested MHI to provide further information on the completion of PSC design. At the NRC public meeting on June 25, 2008, MHI presented additional information and commitments on its plan for completing the design for US-APWR PSC.

With this letter, MHI formally transmits to the NRC Staff the additional information and commitments made by MHI at the June 25 public meeting and provides further information in response to the NRC's comments at the meeting.

Enclosure 2 provides the design completion plan for the US-APWR PSC. Technical reports and related information for audit will be available consistent with the planned engineering and procurement schedule. MHI expects that this plan will provide sufficient information to the NRC to close all PSC DAC during the DCD review phase.

Enclosure 3 provides a table of the design completion dates for the US-APWR PSC in DCD Chapter 3, Table 3.2-2. This table also identifies the Risk Significant PSC derived from the US-APWR PRA.

Enclosure 4 shows the US-APWR Engineering Schedule Overview for US-APWR PSC design and fabrication, which was requested by the NRC for future QA inspection activities, and already submitted to the NRC (Reference 2).

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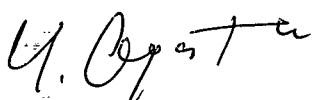
MHI has reviewed the guidance contained in the Commission's SRM on SECY-90-377 and 54 Federal Regulation 15,372 and 15, 382 dealing with the level of design information necessary for the US-APWR to be considered "essentially complete". MHI believes that it will meet this level of design information completion prior to the start of plant construction, and has committed to the NRC the schedule for its availability for NRC review or audit of the plan described in Enclosure 2. This plan identifies the detailed schedule for providing Design Specifications for all US-APWR PSCs, which provide the necessary information for procurement and manufacture of PSCs, and stress reports for the risk significant PSCs identified in the probabilistic risk assessment previously submitted to the NRC.

Enclosures 2-4 contain information that MHI considers proprietary, and therefore these enclosures 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. In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the proprietary version of Enclosures 2-4 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 letter. His contact information is provided below.

Sincerely,



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

Enclosures:

1. Affidavit of Yoshiki Ogata
2. "Design Completion Plan for US-APWR Piping Systems and Components"
3. "Design Completion Schedule for US-APWR Piping Systems and Components"
4. "US-APWR Engineering Schedule Overview"

CC: J. A. Ciocco
C. K. Paulson

Contact Information
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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 YOSHIKI OGATA

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 documents entitled "Design Completion Plan for US-APWR Piping Systems and Components", "Design Completion Schedule for US-APWR Piping Systems and Components" and "US-APWR Engineering Schedule Overview" dated July 2008, and have determined that portions of the document contain proprietary information that should be withheld from public disclosure. The 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 document indicates that all information identified as "Proprietary" 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 designating the referenced information as confidential is that it describes the unique schedule of design, analysis, procurement, manufacturing and other activities regarding plant engineering, 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 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 engineering schedule methodology. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.

   B. Loss of competitive advantage of the US-APWR created by benefits of enhanced engineering schedule.

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 14th day of July 2008.

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