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

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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-09005

Subject: Feedback to the NRC's Projected Schedule Change for Phases Two and Three of the US-APWR Design Certification and Proposal for Facilitating NRC's Technical Review

References:
1) "PROJECTED SCHEDULE CHANGE FOR PHASES TWO AND THREE OF THE US-APWR DESIGN CERTIFICATION," dated December 22, 2008
2) "Small Break LOCA Methodology for US-APWR," (MUAP-07013-P), July 2007
3) "Non-LOCA Methodology," (MUAP-07010-P), July 2007

Mitsubishi Heavy Industries, Ltd ("MHI") wishes to express its appreciation to the Nuclear Regulatory Commission ("NRC") Staff for its licensing review effort on the Design Certification ("DC") for the US-APWR standard design.

Reference 1 identifies the NRC's estimated change in projected schedule for the completion of Phases 2 and 3 of US-APWR Design Control Document ("DCD"). This change is attributed to a greater than anticipated scope of work required for the NRC to conduct its review of the safety analysis codes described in the Topical Reports ("TRs"), References 2 and 3, associated with Chapter 15 of the DCD. The contents of these TRs were outlined to the NRC staff in Pre-Application Meetings held in February and March 2007 and the TRs were submitted to the NRC in July 2007. The contents of the TRs and requested review scopes of the TRs have remained the same.

MHI also notes that – importantly – no schedule changes are projected for Phases 4, 5 and 6 of the US-APWR DCD and that the NRC's target date of September 2011 for the Final Safety Evaluation Report remains unchanged. In this respect, MHI has previously identified to the NRC the analysis codes, described in the TRs and used by MHI for the safety design of the US-APWR, are modified versions of the original codes previously approved by the NRC or used by the NRC. Therefore, MHI believes that there will be no significant safety or technical issues to be resolved in the NRC's review of the MHI modified codes used for the US-APWR.

Nonetheless, it is in MHI's best interest to fully support the additional code review activities by the NRC consultants and to aggressively work with the NRC to eliminate, or at least reduce, the time impact of these reviews on the NRC's projected Phases 2 and 3 review schedules. In order to facilitate the NRC's Staff review, MHI proposes the following actions, which MHI is prepared to commence immediately:

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1. Identification and Discussion of NRC's Code Review Activities:

   Following up on the NRC's offer in Reference 1 for "further communications . . . to describe and explain the technical review of the TRs," MHI would like to discuss with the NRC Staff the code review activities and actions to be performed by the NRC's consultants and associated schedules in order for MHI to fully support those activities. This communication could be the first of a series of face-to-face meetings suggested below, or a telephone conference, and would provide the basis for MHI providing the necessary technical support to facilitate the NRC's review.

2. Face-to-Face Meetings to Facilitate NRC Review Activities:

   MHI suggests a face-to-face meeting (or meetings as necessary) between MHI engineers and the NRC Staff and their consultants to discuss the Topical Reports, RAI responses, executable codes, input decks and input manuals for the safety analysis codes associated with Chapter 15 of the DCD.

3. Technical Support to Facilitate NRC's Review Activities

   Knowing the NRC's review process and plan, MHI will dedicate appropriate engineering support to assist the NRC Staff and their consultants in confirmatory and verification analyses, and other technical areas as needed as identified with the NRC. Additional meetings, as requested by the NRC and their consultants, could be held to discuss assumptions, results, submittal schedules, etc.

MHI sincerely hopes that the above proposals are reasonable and considered constructive by the NRC. MHI requests the NRC Staff to continue its Phases 2 and 3 schedule review with consideration being given to the impact of MHI's efforts to reduce the review period for the computer codes. MHI sincerely appreciates NRC maintaining the current overall review schedule and will work with the NRC Staff to complete Phases 2 and 3 by March 2010 and June 2010, respectively. To this end, MHI stands ready to assist in any way possible, including but not limited to the steps outlined above.

MHI looks forward to further communications with the NRC, by meeting or teleconference, to discuss and explain the proposed actions in more detail.

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc, for any questions that the NRC may have concerning this letter. His contact information is below.

Sincerely,

Y. Ogata

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

CC: J. A. Ciocco
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