


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

March 11, 2009

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-09085

Subject: MHI's Responses to US-APWR DCD RAI No. 197-1800 Revision 0

Reference: 1) "Request for Additional Information No. 197-1800 Revision 0, SRP Section: 19 - Probabilistic Risk Assessment and Severe Accident Evaluation, Application Section: 19," dated February 9, 2009.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document as listed in Enclosures.

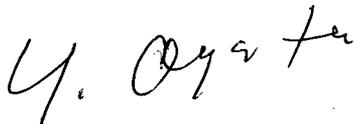
Enclosed are the responses to 6 RAIs contained within Reference 1. Of these RAIs, two questions #19-303 and 19-304 will not be answered within this package. These questions require additional time for internal discussions and computations, and will be answered by 28th and 10th of April 2009, respectively.

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) 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).

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,



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

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Enclosures:

1. Affidavit of Yoshiki Ogata
2. Responses to Request for Additional Information No. 197-1800 Revision 0 (proprietary version)
3. Responses to Request for Additional Information No. 197-1800 Revision 0 (non-proprietary version)

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

Contact Information

C. Keith Paulson, Senior Technical Manager
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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-09085

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) 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 "Responses to Request for Additional Information No.197-1800 Revision 0" dated 11 March 2009, and have determined that portions of the document 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 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 holding the referenced information confidential is that it describes the unique design and methodology developed by MHI for performing the design of the US-APWR reactor.
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 methodology related to the analysis.
- B. Loss of competitive advantage of the US-APWR created by benefits of modeling information.

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 11th day of March 2009.

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is written in a cursive style with a long horizontal stroke at the end.

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

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Enclosure 3

UAP-HF-09085
Docket Number 52-021

Responses to Request for Additional Information No. 197-1800
Revision 0

March 2009
(Non-proprietary)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

3/11/2009

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No.52-021

RAI NO.: NO. 197-1800 REVISION 0
SRP SECTION: 19 – Probabilistic Risk Assessment and Severe Accident Evaluation
APPLICATION SECTION: 19
DATE OF RAI ISSUE: 2/9/2009

QUESTION NO.: 19-300

Please provide the Findings and Observations for the large release frequency (LE) Main and Supporting Requirements from the ASME PRA standard (ASME RA-Sb-2005) Peer Review. Please discuss any requirements that were not met at Capability Levels II or III and the reasons why these were not met.

ANSWER:

Peer review on Level 2 PRA in accordance with the ASME PRA standard was conducted from 3 to 5 October 2007. Attachment to this answer is the resulting peer review report.

Regarding the conformance to the requirements of ASME standard, strictly speaking US-APWR L2 PRA can meet none of the requirements because the US-APWR L2 PRA discusses on LRF, but not on LERF. MHI therefore reviews the ASME requirements with substituting the word LERF into LRF.

Similar request to perform a self assessment on the conformance to the ASME standard is given in the Question 19-289 of RAI#151. Assessment result on the L2 portion will be answered together with the answer to Question 19-289 by 12 April 2009.

Attachment:

- (1) Probabilistic Risk Assessment Peer Review Report for Level 2 PRA - Results of a Peer Review for the PRA for MHI US APWR Design Certification, KNFCS-MHI-2007-5, KNF Consulting Services LLC, October 2007
(Note) The descriptions in "Plant Response of Resolution" are added by MHI

Impact on DCD

There is no impact on DCD from this RAI.

Impact on COLA

There is no impact on COLA from this RAI.

Impact on PRA

There is no impact on PRA from this RAI.