


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

April 27, 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-09181

Subject: MHI's Second Responses to US-APWR DCD RAI No.256-1467

References: 1) "Request for Additional Information No. 256-1467 Revision 0, SRP Section: 04.03— NUCLEAR DESIGN, Application Section: 4.03," dated March 3, 2009.
2) Letter MHI Ref: UAP-HF-09119 from Y. Ogata (MHI) to U.S. NRC, "MHI's Response to US-APWR DCD RAI No. 256-1467" dated March 30, 2009

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "MHI's Second Responses to US-APWR DCD RAI No.256-1467".

Enclosed is the second response to the RAIs contained within Reference 1. The initial responses were submitted with Reference 2.

As indicated in the enclosed materials, the attachment data (Enclosure 3) of 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.

This letter includes a copy of the non-proprietary document (Enclosure 2), proprietary digital data (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 3 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 provided below.

Sincerely,

Y. Ogata

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

*DO81
NRC*

Enclosures:

1. Affidavit of Yoshiki Ogata
2. Response to Request for Additional Information No. 256-1467 Revision 0 (non-proprietary)
3. CD1: "Attachment of Response to RAI's item 04.03-18 of NRC Requests"
– Proprietary information

The files contained in this CD are listed in Attachment 1.

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
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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 "Attachment of Response to RAI's item 04.03-18 of NRC Requests" dated April 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 to make data from a lot of design parameters requires knowledge and know-how about using the ANC and PARAGON codes.
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 arrangement of the input data of the nuclear design for the US-APWR.
- B. Loss of competitive advantage of the US-APWR created by benefits of the know-how about using the calculation codes.

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 27th day of April, 2009.



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

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Enclosure 2

UAP-HF-09181
Docket Number 52-021

Response to Request for Additional Information No. 256-1467
Revision 0

April, 2009
(Non-Proprietary)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

4/27/2009

**US-APWR Design Certification
Mitsubishi Heavy Industries
Docket No.52-021**

RAI NO.: NO.256-1467 REVISION 0
SRP SECTION: 04.03 – NUCLEAR DESIGN
APPLICATION SECTION: 4.03
DATE OF RAI ISSUE: 3/3/2009

QUESTION NO. : 04.03-18

DCD Section 4.3.3.1: Provide the input deck, output, and input manual for PARAGON and ANC codes used to determine core parameters. This question is asked to satisfy GDC10.

ANSWER:

MHI provides the input deck, output, and input manual for PARAGON and ANC in electronic files for the US-APWR first cycle depletion and a representative fuel assembly.

These electronic files are attached as Enclosure 3 of the response on RAI No.256-1467 submitted to the NRC (MHI Ref: UAP-HF-09181).

Impact on DCD

There is no impact on the DCD.

Impact on COLA

There is no impact on the COLA.

Impact on PRA

There is no impact on the PRA.

Attachment 1

FILES CONTAINED IN CD 1

**CD 1: "Attachment of Response to RAI's item 04.03-18 of NRC Requests"
– Version Containing Proprietary Information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
-PARAGON input: 001 SRSB1467_NO.4.3-18_PARAGON_inp.pdf	90KB	Proprietary
-PARAGON output: 002 SRSB1467_NO.4.3-18_PARAGON_out.pdf	202KB	Proprietary
-PARAGON input guide: 003 guide_SRSB1467_NO.4.3-18_paragon.pdf	159KB	Proprietary
-ANC input: 004 SRSB1467_NO.4.3-18_ANC_inp.pdf	1144KB	Proprietary
-ANC output: 005 SRSB1467_NO.4.3-18_ANC_out.pdf	2537KB	Proprietary
-ANC input guide: 006 guide_SRSB1467_NO.4.3-18_anc.pdf	146KB	Proprietary