


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

June 10, 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-09305

Subject: Withdrawal of the proposal to delete the COL Item 19.3(6)

- References:**
- 1) Letter MHI Ref: UAP-HF-08153 from Y. Ogata (MHI) to U.S. NRC, "Submittal of US-APWR Design Control Document Revision 1 in Support of Mitsubishi Heavy Industries, Ltd.'s Application for Design Certification of the US-APWR Standard Plant Design" dated on August 29, 2008.
 - 2) Letter MHI Ref: UAP-HF-08259 from Y. Ogata (MHI) to U.S. NRC, "Transmittal of COL Information Update for US-APWR Design Control Document Revision 1" dated on November 7, 2008
 - 3) NEI 91-04 Revision 1, *Severe Accident Issue Closure Guidelines*, Nuclear Energy Institute, December 1994.

This transmittal addresses COL item 19.3(6) in Mitsubishi Heavy Industries, Ltd. (MHI) design certification application for the US-APWR Standard Plant Design (Reference 1, "DCD"). In the Reference 2 letter, MHI proposed to the NRC to delete COL item 19.3(6) listed in the DCD. However, in accordance with the recent discussions held among the NRC, MNES and MHI on the issue of the proposal to delete COL item 19.3(6), MHI understands the position of the NRC staff is that an accident management program should be developed in accordance with NEI 91-04 (Reference 3), and has no objection to withdraw the proposal to delete the COL item. Rather than withdrawing the proposal to delete COL item 19.3(6), MHI would like to propose revising COL item 19.3(6) as follows:

COL 19.3(6) The COL applicant develops an accident management program based on the U.S. industry initiated and coordinated program in this area and related information from efforts on an international front which includes severe accident management procedures that capture important operator actions. Training requirements are also included as part of the accident management program.

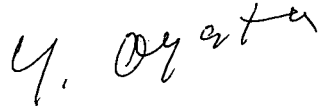
MHI believes this proposed change makes it clear what is required for development of an accident management program, and the essence of NEI 91-04 is appropriately incorporated. MHI also believes that the proposed updates will facilitate the NRC's review of the DCD.

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear

DOB
NRC

Energy Systems, Inc. if the NRC has questions concerning any aspect of this letter. His contact information is provided below.

Sincerely,

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.

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

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

Contact Information

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