MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

July 24th, 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-09395

Subject: MHI's Responses to US-APWR DCD RAI No. 406 COLP-2896 Revision 1

Reference: 1) "Request for Additional Information No. 406 COLP-2896 Revision 1, SRP Section: 18 - Human Factors Engineering, Application Section: 18.2 Operating Experience Review," dated June 24th, 2009.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Responses to Request for Additional Information No. 406 COLP-2896 Revision 1."

Enclosed is the response to the RAI contained within Reference 1.

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,

Y. Ogata

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

Enclosure:

1. Responses to Request for Additional Information No. 406 COLP-2896 Revision 1

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

D081
NRO

Contact Information
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Enclosure 1

UAP-HF-09395
Docket No. 52-021

Responses to Request for Additional Information No. 406 COLP-2896 Revision 1

July 2009

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

7/24/2009

US-APWR Design Certification

Mitsubishi Heavy Industries

Docket No. 52-021

RAI NO.:	**NO. 406 COLP-2896 REVISION 1**
SRP SECTION:	**18 - HUMAN FACTORS ENGINEERING**
APPLICATION SECTION:	**18.2 OPERATING EXPERIENCE REVIEW**
DATE OF RAI ISSUE:	**6/24/2009**

QUESTION NO. 18-48

Section 3.4.1 of NUREG-0711, Criterion 5 states: The OER should identify risk important Human Actions (HAs) that have been assessed as being different or those actions in which errors have occured. These human actions should be identified as requiring special attention during the design process to lessen their probability.

The Staff has reviewed MUAP-08014-P for the OER processes and MHI makes no mention in the report of risk-important HAs that have been either considered applicable or not applicable. MHI should clarify which elements of the OER report include the risk important HA analysis.

ANSWER:

The OER process takes a robust approach which examines all nuclear LER's that relate to human performance, regardless of their risk significance. Similarly, technology related issues are also examined, which clearly have no nuclear risk significance. There is no filtering within the OER process to examine only risk important Human Actions and no process to identify human actions that are considered risk significant. Risk significant human actions for the US-APWR are examined within the HRA program element.

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

This completes MHI's responses to the NRC's questions.