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

July 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-09405

Subject: Transmittal of the NRC Audit Meeting Materials regarding HFE/HSI Program Discussion.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the meeting materials that have been presented during the NRC Audit meeting regarding HFE/HSI Program Discussion on July 14 to 15.

The enclosed presentation materials contain information that MHI considers proprietary, and therefore the report should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. Accordingly, the meeting materials are being submitted in two versions, in separate compact discs. One version (in CD 1 of Enclosure 2) contains the complete proprietary version of the meeting materials. A non-proprietary version of the meeting materials is enclosed in CD 2 (Enclosure 3). In the non-proprietary version, the proprietary information, bracketed in the proprietary version, is replaced by the designation "[ ]". In accordance with the NRC submittal procedures, this letter includes an Affidavit (Enclosure 1) that identifies the reasons why the proprietary version of the Report should be withheld from 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 this submittal. His contact information is provided below.

Sincerely,

Y. Ogata

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

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NRO

Enclosures:

1. Affidavit of Yoshiki Ogata

2. CD 1: "Audit Meeting Material: MUAP-09366 Human System Interface Description and Human Factors Engineering Process"
   – Version containing Proprietary information

3. CD 2: "Audit Meeting Material: MUAP-09366 Human System Interface Description and Human Factors Engineering Process"
   – Version not containing Proprietary information

The file contained in each CD is listed in Attachments 1 and 2 hereto.

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

Contact Information
C. Keith Paulson, Senior Technical Manager
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ENCLOSURE 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
MITSUBISHI HEAVY INDUSTRIES, LTD.
US-APWR
Standard Plant Design Certification Application

AFFIDAVIT OF YOSHIKI OGATA

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 "HFE/HSI Program Discussion" dated October 14 to 15, 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 the parameters developed by MHI and not used in the exact form by any of MHI's competitors. This information was developed at significant cost to MHI, since it required the performance of research and development and the performance of detailed hardware design and software development extending over several years.

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 the plant design and parameters. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.

   B. Loss of competitive advantage of the US-APWR created by benefits of enhanced plant safety, and reduced operation and maintenance costs. .

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 July, 2009.

Y. Ogata

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

ATTACHMENT 1

FILE CONTAINED IN CD 1

CD 1: "Audit Meeting Material: MUAP-09366 Human System Interface Description and Human Factors Engineering Process"
– Version Containing Proprietary Information

Contents of CD

File Name	Size	Sensitivity Level
UAP-HF-09366-P HSI-HFE Material_Part1.pdf	49.7 MB	Proprietary
UAP-HF-09366-P HSI-HFE Material_Part2.pdf	10.1 MB	Proprietary

ATTACHMENT 2

FILE CONTAINED IN CD 2

CD 2: "Audit Meeting Material: MUAP-09366 Human System Interface Description and Human Factors Engineering Process"
– Version Not Containing Proprietary Information

Contents of CD

File Name	Size	Sensitivity Level
UAP-HF-09366-NP HSI-HFE Material.pdf	13.6 MB	Non-Proprietary