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November 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-09520

Subject: MHI's US-APWR HFE Program Compliance to NUREG- 0711

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "US-APWR HFE Program NUREG- 0711 Compliance Roadmap." The document is being submitted electronically in compact disc ("CD").

At the HFE program review meeting of July 14, 2009, MHI was requested to provide a roadmap that would help the staff locate the appropriate sections of MHI HFE program documentation that demonstrate compliance to the review criteria of NUREG- 0711 Revision 2. The roadmap is provided in the table attached, "US-APWR HFE Program NUREG- 0711 Compliance Roadmap".

The following explains the contents of the table:

- The table includes a section for each NUREG- 0711 Program Element
- The left most column, labeled "NUREG- 0711 Revision 2 Review Criteria", is the review criteria, copied directly from NUREG- 0711.
- The column labeled "Current Documentation" provides pointers to the specific areas of previously submitted MHI documentation, that address the review criteria. The pointers are as focused as possible; typically to no more than one page of specific correlating text. Recognizing that there is not always a direct correspondence between review criteria and MHI documentation, explanatory text may be included in this column to help the staff understand the correlation. This includes cases where NUREG- 0711 defines the review criteria at a programmatic level, however MHI's documentation fulfills this criteria in a lower level document, such as a program element report.
- In some cases the review criteria correlates to detailed HFE program activities that are managed by US-APWR ITAACs, and therefore are not fulfilled by MHI's "Current Documentation". For these criteria, explanations of the compliance method and pointers to the appropriate future documentation, are provided in the column entitled "Planned Documentation".

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- For NUREG- 0711 review criteria that MHI has not fulfilled, and does not plan to fulfill, a justification for non-compliance is provided in the column entitled "Gap".

We hope the staff finds this document helpful in reviewing the US-APWR HFE Program and reaching a favorable conclusion regarding NUREG- 0711 compliance. 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,



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

Enclosure:

1. CD1: US-APWR HFE Program NUREG- 0711 Compliance Roadmap (MUAP-09024, Rev.0)

The file contained in CD is listed in Attachment 1 hereto.

CC: J. A. Ciocco
M. S. Magee
C. K. Paulson

Contact Information

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ATTACHMENT 1

FILES CONTAINED IN CD 1

CD 1: MUAP-09024 "US-APWR HFE Program NUREG- 0711 Compliance Roadmap"

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
MUAP-09024 NUREG0711 Roadmap.pdf	0.7 MB	Non-Proprietary