MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

February 2, 2010

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-10024

Subject: Amendment of Additional Information for US-APWR Seismic Analysis

References: 1) Letter MHI Ref. UAP-HF-10002 from Y. Ogata (MHI) to U.S. NRC, "Submittal of Additional Information for US-APWR Seismic Analysis and Sump Strainer Head Loss Test," dated January 12, 2010.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") submits to the U.S. Nuclear Regulatory Commission ("NRC") the enclosed additional information for US-APWR Seismic Analysis.

Enclosure 2 provides the proposed schedule of submittals which include Seismic Analysis procedure and results. This enclosure amends the information submitted in Reference 1.

The enclosed schedule contains information that MHI considers proprietary, and therefore the enclosed documents 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. In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the proprietary version of the Document should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

MHI requests than any NRC comments or questions concerning the commitments made by MHI in the attached documents be discussed as soon as possible so that they may be expeditiously factored into the MHI engineering activities.

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of this letter. 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. Information Submittal Plan of Seismic Design

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 "Information Submittal Plan of Seismic Design" dated February 2010, and have determined that portions of the document contain proprietary information that should be withheld from public disclosure. The page containing proprietary information is 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 designating the referenced information as confidential is that it describes the unique schedule of design, analysis and other activities regarding Seismic Analysis 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 scheduling methodology. 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 engineering schedule.

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 2nd day of February, 2010.

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