

  
**MITSUBISHI HEAVY INDUSTRIES, LTD.**  
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TOKYO, JAPAN

October 26, 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-10292

**Subject: Revision 2 of the Technical Report MUAP-07024 "Qualification and Test Plan of Class 1E Gas Turbine Generator System"**

With this letter, Mitsubishi Heavy Industries, LTD. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) the revision 2 of the technical report entitled "Qualification and Test Plan of Class 1E Gas Turbine Generator System" which was previously submitted in November 2009 as revision 1 and has been revised to make clear the test conditions and reflect the latest design information.

As indicated in the enclosed materials, this technical report contains information that MHI, Kawasaki Heavy Industries, LTD. (KHI), and Engine Systems, Inc. (ESI) consider proprietary, and therefore 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 technical report is being submitted in two versions, in separate compact discs. One version (in CD 1) contains the complete proprietary version of the technical report. A non-proprietary version of the technical report is enclosed in CD 2. 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 that identifies the reasons why the proprietary version of the technical 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 the submittals. His contact information is below.

Sincerely,

*Atsushi Kumaki for.*

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

*DOB/HRD*

Enclosures

1 - Affidavit of Atsushi Kumaki

2 – CD 1:” Qualification and Test Plan of Class 1E Gas Turbine Generator System”  
(MUAP-07024-P, Rev.2) – Version that contains proprietary information

3 - CD 2:” Qualification and Test Plan of Class 1E Gas Turbine Generator System”  
(MUAP-07024-NP, Rev.2) – Version that does not contain proprietary information

The files contained in each CD are listed in Attachments 1 and 2 hereto.

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

Contact Information

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**ENCLOSURE 1**

Docket No. 52-021  
MHI Ref: UAP-HF-10292

**MITSUBISHI HEAVY INDUSTRIES, LTD.**

**AFFIDAVIT**

I, Atsushi Kumaki, state as follows:

1. I am Group Manager, Licensing Promoting Group in 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 "Qualification and Test Plan of Class 1E Gas Turbine Generator System" dated October 2010, 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 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, Kawasaki Heavy Industries, LTD. (KHI), and Engine Systems, Inc. (ESI) 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 of the gas turbine generator system, developed by MHI, KHI, and ESI and not used in the exact form by any of MHI's, KHI's, and ESI's competitors. This information was developed at significant cost to MHI, KHI, and ESI, since it required the performance of Research and Development, detailed design for its software and hardware 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 supporting 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, KHI, and ESI.
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 technical report 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 class 1E gas turbine generator . Providing public access to such information permits competitors to duplicate or mimic the technology 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 associated with the class 1E gas turbine generator.

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 26th day of October, 2010.



Atsushi Kumaki,  
Group Manager- Licensing Promoting Group in APWR Promoting Department  
Mitsubishi Heavy Industries, LTD.

# **ATTACHMENT 1**

## **FILES CONTAINED IN CD 1**

**CD 1: "Qualification and Test Plan of Class 1E Gas Turbine Generator System"  
(MUAP-07024-P, Rev.2) - Version that contains proprietary information**

### **Contents of CD**

| <b><u>File Name</u></b>                                   | <b><u>Size</u></b> | <b><u>Sensitivity Level</u></b> |
|---|--------------------|---------------------------------|
| 001 Qualification and Test Plan of Class 1E GTG-P(R2).pdf | 18.3MB             | Proprietary                     |

## **ATTACHMENT 2**

### **FILES CONTAINED IN CD 2**

**CD 2: "Qualification and Test Plan of Class 1E Gas Turbine Generator System"  
(MUAP-07024-NP, Rev.2) - Version that does not contain proprietary  
information**

#### **Contents of CD**

| <b><u>File Name</u></b>                                    | <b><u>Size</u></b> | <b><u>Sensitivity Level</u></b> |
|--|--------------------|---------------------------------|
| 001 Qualification and Test Plan of Class 1E GTG-NP(R2).pdf | 12.3MB             | Non-Proprietary                 |