MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

December 03, 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-10299

Subject: Revision to MHI's RAI Responses on Topical Report MUAP-07011-P (R0) "LARGE BREAK LOCA CODE APPLICABILITY REPORT"

Reference: 1) Mitsubishi Heavy Industries, Ltd., "MHI's Response to the NRC's Request for 4th Set of Additional Information on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0), UAP-HF-10247, dated September 13, 2010.
2) "REQUEST FOR ADDITIONAL INFORMATION US-APWR Topical Report: LARGE BREAK LOCA Code Applicability, MUAP- 07011-P (R0), dated August 8, 2010.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") an official document entitled "Revision to MHI's RAI Responses on Topical Report MUAP-07011-P (R0) "LARGE BREAK LOCA CODE APPLICABILITY REPORT"". In the enclosed document, MHI provides the revised response to RAI-1 in Reference 1, requested in Reference 2. The Referenced Materials are being submitted electronically in the Optical Storage Media ("OSM") enclosure. The files contained on OSM are listed on the associated enclosure cover sheet.

As indicated in the enclosed materials, this document contains information that MHI considers proprietary, and therefore 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.

This letter includes a copy of proprietary report (Enclosure 2), an Optical Storage Media ("OSM") containing requested electronic materials (Enclosure 3) and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the bases of MHI request that all materials designated as "Proprietary" in Enclosure 2 and all information and data recorded on OSM of Enclosure 3 be withheld from public 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.

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NRO

Sincerely,

Y. Ogata

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

Enclosures:

1. Affidavit of Yoshiki Ogata

2. Revision to MHI's RAI Responses on Topical Report MUAP-07011-P (R0) "LARGE BREAK LOCA CODE APPLICABILITY REPORT"

3. OSM: Modified Code and Calculated Cases (Proprietary)
   The files contained in this OSM are listed in Attachment 1.

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

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

Docket No.52-021
MHI Ref: UAP-HF-10299

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, being duly sworn according to law, depose and 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 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 " Revision to MHI's RAI Responses on Topical Report MUAP-07011-P (R0) "LARGE BREAK LOCA CODE APPLICABILITY REPORT"" and have determined that portions of the report 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 technical report indicates that all information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4). Similarly, all information and data recorded on the enclosed OSM should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

3. The information in the report identified as proprietary by MHI 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 codes and files developed by MHI for the fuel of the US-APWR and also contains information provided to MHI under license from the Japanese Government. These codes and files were developed at significant cost to MHI, since they required the performance of detailed calculations, analyses, and testing extending over several years. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI and the Japanese Government.

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's review of MHI's Application for certification of its US-APWR Standard Plant Design.

6. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without the costs or risks associated with the design of new fuel systems and components. Disclosure of the information identified as

proprietary would therefore have negative impacts on the competitive position of MHI in the U.S. nuclear plant market.

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 3rd day of December, 2010.

Y. Ogata

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