


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

December 3, 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-10321

**Subject: MHI's Verification and Validation Reports and Supplemental Analysis of
MARVEL-M / VIPRE-01M Code Version (Related to SRP 15.0.2)**

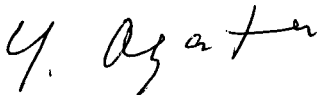
Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the Optical Storage Medium ("OSM") entitled "Verification and Validation Reports and Supplemental Analysis of MARVEL-M / VIPRE-01M Code Version". This information is being provided in response to discussions of the MARVEL-M and VIPRE-01M codes during the Safety Analysis Code Software Quality Assurance Audit on October 19-20 and 25, 2010.

As indicated in the enclosed materials, Enclosure 2 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 an OSM (Enclosure 2), which includes a copy of the proprietary version of the Verification and Validation Report for MARVEL-M and VIPRE-01M and additional proprietary supporting documents, and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests that all material designated as "Proprietary" in Enclosure 2 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,



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

DOB/
NRO

Enclosure:

1. Affidavit of Yoshiki Ogata
2. CD: "Verification and Validation Reports and Supplemental Analysis of MARVEL-M / VIPRE-01M Code Version" and Supporting Documentation (proprietary)

The files contained on the CD are listed in Attachment 1 hereto.

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

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MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

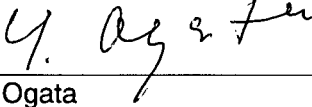
I, Yoshiki Ogata, being duly sworn according to law, depose and state as follows:

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 Optical Storage Medium ("OSM") dated December 3, 2010, and have determined that the OSM contains proprietary information that should be withheld from public disclosure. The OSM contains only proprietary documents. The first page of each document indicates that information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).
3. The basis for holding the referenced information confidential is that it describes the unique design of the safety analysis, developed by MHI (the "MHI Information").
4. The MHI Information is 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 detailed design for its software and hardware extending over several years. Therefore public disclosure of the materials would adversely affect MHI's competitive position.
5. The referenced information has in the past been, and will continue to be, held in confidence by MHI and is always subject to suitable measures to protect it from unauthorized use or disclosure.
6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information.
7. 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.
8. 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 and testing of new 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.



Yoshiaki Ogata

Attachment 1

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FILES CONTAINED ON CD

CD: "Verification and Validation Reports and Supplemental Analysis of
MARVEL-M / VIPRE-01M Code Version and Supporting Documentation"

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
1. 000_V&V Report of MARVEL-M and VIPRE-01M.pdf	1,588 KB	Proprietary
2. 001_Attachment-1.pdf	347 KB	Proprietary
3. 002_Attachment-2.pdf	270 KB	Proprietary
4. 003_Attachment-3.pdf	778 KB	Proprietary
5. 004_Attachment-4.pdf	262 KB	Proprietary
6. 005_Attachment-5.pdf	268 KB	Proprietary
7. 006_Attachment-6.pdf	622 KB	Proprietary
8. 007_Attachment-7.pdf	249 KB	Proprietary
9. 008_Attachment-8.pdf	268 KB	Proprietary
10. 009_Attachment-9.pdf	1,089 KB	Proprietary
11. 010_Attachment-10.pdf	229 KB	Proprietary
12. 011_Attachment-11.pdf	268 KB	Proprietary
13. 012_Attachment-12.pdf	727 KB	Proprietary
14. 013_Attachment-13.pdf	922 KB	Proprietary
15. 014_Attachment-14.pdf	102 KB	Proprietary
16. 015_Attachment-15.pdf	461 KB	Proprietary
17. 016_Attachment-16.pdf	121 KB	Proprietary
18. 017_Attachment-17.pdf	250 KB	Proprietary
19. 018_Attachment-18.pdf	99 KB	Proprietary
20. 019_Attachment-19.pdf	95 KB	Proprietary
21. 020_Attachment-20.pdf	101 KB	Proprietary
22. 021_Attachment-21.pdf	98 KB	Proprietary
23. 022_Attachment-22.pdf	187 KB	Proprietary