MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

March 7, 2011

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-11060

Subject: Revision 1 of the Technical Report MUAP-09007 "Summary of Analysis Results for the US-APWR Pressurizer"

References:

1. UAP-HF-09139, Transmittal of the Summary of Stress Reports for the US-APWR Piping System and Components

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") its technical report which provides a summary of the Stress Reports for the US-APWR Piping System and Components. The submittal is as follows:

- Revision 1 of the Technical Report MUAP-09007 "Summary of Analysis Results for the US-APWR Pressurizer", which was previously submitted in March 2009, as revision 0 (Reference 1)

This document has been revised to reflect due to the sophistication of methodology for building seismic analysis. This submittal includes updates to Technical Report MUAP-09007. The complete stress report for Pressurizer will be available for audit in June, 2011.

As indicated in the enclosed materials, these documents contain 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. A non-proprietary version of each document is also being submitted in this package. In the non-proprietary version the proprietary information, bracketed in the proprietary version, is replaced by the designation "[ ]".

This letter includes a copy of the proprietary versions (Enclosure 2), a copy of the non-proprietary versions (Enclosure 3), and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully request that all materials designated as "Proprietary" in Enclosure 2 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 the submittal. His contact information is below.

D081
NRO

Sincerely,

Y. Ogata

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

Enclosures:

1. Affidavit of Yoshiki Ogata

2. CD 1: "MUAP-09007-P (R1) Summary of Analysis Results for the US-APWR Pressurizer"

–Version containing proprietary information

3. CD 2: "MUAP-09007-NP (R1) Summary of Analysis Results for the US-APWR Pressurizer"

–Version not containing 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
C. Keith Paulson, Senior Technical Manager
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ENCLOSURE 2

Docket No. 52-021

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

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 "Summary of Analysis Results for the US-APWR Pressurizer" dated March 2011 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 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 holding the referenced information confidential is that it describes the unique design of the stress analysis results related to the US-APWR piping systems and components, 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 performance of detailed hardware design 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 and MELCO in their design of new nuclear power plants without incurring the costs or risks associated with the design and testing 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 unique plant design of the stress analysis. 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 plant safety, and reduced operation and maintenance costs.

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 7th day of March, 2011.

Y. Ogata

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

ATTACHMENT 1

FILES CONTAINED IN CD 1

CD 1: "MUAP-09007-P (R1) Summary of Analysis Results for the US-APWR Pressurizer"

–Version containing proprietary information

Contents of CD

File Name	Size	Sensitivity Level
MUAP-09007-P(R1).pdf	4.0MB	Proprietary

ATTACHMENT 2

FILES CONTAINED IN CD 2

CD 2: "MUAP-09007-NP (R1) Summary of Analysis Results for the US-APWR Pressurizer"

–Version not containing proprietary information

Contents of CD

File Name	Size	Sensitivity Level
MUAP-09007-NP(R1).pdf	0.3MB	Non-proprietary