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TOKYO, JAPAN

February 18, 2011

Mr. Michael Johnson, Director
Office of New Reactors
U.S. Nuclear Regulatory Commission

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Subject: Commitments to Improve US-APWR DCD Review Schedule

Dear Mr. Johnson:

In the drop-in meeting with you and your staff on February 15, 2011, Mitsubishi and its customers identified their deep concern associated with the draft US-APWR DCD review schedule developed by the NRC. As discussed in the meeting, this schedule, if published, could have significant implications for our customers' COLA schedules and, ultimately, plant construction.

In response to these concerns, Mitsubishi, with support of the of the US-APWR Design Center Working Group (DCWG) members, Dominion and Luminant, proposed to the NRC new initiatives that could improve the NRC's review schedule. This letter provides written confirmation of the actions to be taken by the organizations signing this letter. The NRC indicated that such a letter would be beneficial prior to formally issuing the revised schedule so that they can consider the possibility that the identified actions would reduce the overall DCD review schedule beginning with Phase 2.

Mitsubishi, Luminant and Dominion will work together, as the DCWG for the US-APWR, on resolving critical issues using task teams with participants from each organization to ensure technically sound and thorough responses are provided to the NRC in a timely manner. The items, listed below, identify the specific actions which Mitsubishi identified during the drop-in meeting.

1. Mitsubishi commits to review all draft RAIs submitted by the NRC within 7 days to identify the proprietary status and to confirm Mitsubishi's accurate understanding of the RAI questions.
2. Mitsubishi commits to respond to all RAI questions within 30 days unless significant analysis or testing is involved in the response.
3. Mitsubishi commits to continue, and expand as necessary, the weekly conference calls dealing with critical technical topics. These calls can be increased if issues requiring focused attention are deemed necessary to expedite resolution. In addition Mitsubishi will provide written objectives associated with the conference calls 24 hours in advance of these discussions unless NRC concurs that circumstances dictated that such information is not required. It is Mitsubishi's expectation that providing this early information will ensure both parties have a common understanding of what is to be accomplished in the conference call.

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4. Mitsubishi commits to participate in additional monthly technical public meetings to resolve and/or respond to RAI questions and critical issues identified by the NRC. These technical meeting topics will be generated as part of the weekly telephone calls which deal with specific technical topics. As an adjunct to this commitment, Mitsubishi will commit to provide objectives to be discussed at the public meeting one week prior to the meeting.
5. Mitsubishi, Luminant and Dominion commit to form a senior management Steering Committee of the DCWG, comprised of executives from each organization, chartered to provide guidance to the technical teams dealing with critical or significant issues. This Committee will meet monthly with Michael Johnson and/or David Matthews to discuss progress of the technical team responses and communications with the NRC Staff and identify issues requiring improved performance. This Committee will also discuss with the NRC any response quality issues that may have schedule implications.
6. Mitsubishi and the Project/Technical Staff of the NRC have begun a rigorous effort to eliminate Open Items (OI) in those DCD chapters which have proceeded to the point of OI identification. Mitsubishi commits to accelerate this process to the point that maximizes participation of the NRC Staff to support this process. Mitsubishi believes this effort can reduce the time required to complete Phase 4 of the DCD schedule and thereby positively affect completion schedule of the Final SER.

Mitsubishi, Dominion and Luminant believe it is important to reiterate that they understand the importance of providing high quality and timely RAI responses, calculations and test results. Therefore, early feedback on response quality, either to the technical teams or the Steering Committee is critical to the future success of shortening the projected NRC review schedule.

In summary, Mitsubishi, Luminant and Dominion recognize the extensive work that the NRC has put into developing a draft schedule; however, we believe some of the timing assumptions that were based on past performance can be reconsidered based on the commitments and resources discussed above. Mitsubishi, Dominion and Luminant are ready and willing to discuss any of the above commitments in more detail at your convenience.

As we emphasized in the drop-in meeting, we believe that it is important to improve the NRC's draft schedule such that the DCD review is completed by the end of 2012, to enable completion of rule-making in the first half of 2013. We believe the commitments discussed in this letter can lead to these improvements and we request that they be considered before establishing new schedules for the DCD and associated COL applications. As we also discussed during our meeting, a potential short term alternative could be to establish a goal of completing the Phase 2 review before the end of 2011, and using the experience gained this year to guide the establishment of the remainder of the review schedule.

We look forward to continuing discussions with you and your staff as we move toward completion of the DCD review.

Sincerely yours,



Kiyoshi Yamauchi
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Mitsubishi Nuclear Energy Systems, Inc.



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