



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

March 31, 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-11092

**Subject: The Additional Information on the Responses to US-APWR DCD RAI No.454-3000 Revision 0 (RAI 19-400)**

- References:
- 1) Letter MHI Ref: UAP-HF-07188 from M. Kaneda to U.S. NRC "Probabilistic Risk Assessment Report for the US-APWR" dated December 31, 2007
  - 2) Letter MHI Ref:UAP-HF-08218 from Y. Ogata to U.S. NRC "Transmittal of Revision 1 of the Technical Reports "US-APWR Probabilistic Risk Assessment" and "US-APWR Probabilistic Risk Assessment (Level 3)" for the US-APWR dated September 29, 2008
  - 3) Letter MHI Ref: UAP-09574 from Y. Ogata to U.S. NRC "Transmittal of Revision 2 of the Technical Report "US-APWR Probabilistic Risk Assessment" for the US-APWR dated December 25, 2009.
  - 4) Letter MHI Ref: UAP-HF-10248 from Y. Ogata to U.S. NRC "The Additional Information on the Responses to US-APWR DCD RAI No.454-3000 Revision 0 (RAI 19-398)" dated September 7, 2010.

With this letter, Mitsubishi Heavy Industries, Ltd. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) the additional information committed in the responses to US-APWR DCD RAI No.454-3000 Revision 0 (RAI 19-400).

The enclosed additional information is the "Seismic Fragilities of Instrumentation and Electrical Equipment Qualified by Testing or Type Testing" This information will be added into the next revision of the technical report entitled "US-APWR Probabilistic Risk Assessment, MUAP-07030" which was previously submitted in References 1, 2, and 3 as Attachment 24E.

Revision 3 of the technical report will be submitted together with the information in MHI's US-APWR Design Certification Application Revision 3 and in Reference 4 by June 30, 2011. This Report is not part of MHI's US-APWR Design Certification Application. As required by 10.C.F.R. § 52.47(a)(27), however, a description of the probabilistic risk assessment (PRA) and a summary of its results are included in Chapter 19 of the Design Control Document (DCD) for the US-APWR. .

The enclosed PRA includes both information that MHI considers proprietary and sensitive unclassified non-safeguards information, generally referred to as security-related information (SRI), which is not to be publicly disclosed under the Commission guidance. Therefore, the report should be withheld from disclosure pursuant to 10 C.F.R. § 2.390. In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the reports should be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) in order to protect MHI proprietary information.

DOB/  
URO

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,

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is fluid and cursive, with the first letter "Y" being particularly large and stylized.

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

Enclosures:

1. Affidavit of Yoshiki Ogata
2. Attachment 24E "Seismic Fragilities of Instrumentation and Electrical Equipment Qualified by Testing or Type Testing"

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-11092

**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 "Attachment 24E Seismic Fragilities of Instrumentation and Electrical Equipment Qualified by Testing or Type Testing" and have determined that portions of the document contain proprietary information that should be withheld from public disclosure.
3. The information identified as proprietary in the enclosed documents have 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 and methodology developed by MHI for performing the design of the US-APWR reactor.
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 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 documents 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 methodology related to the analysis.
  - B. Loss of competitive advantage of the US-APWR created by benefits of modeling information.

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 31st day of March 2011.

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is written in a cursive style with a large initial "Y" and a long, sweeping tail.

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