


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

March 30, 2011

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Jeffery A. Ciocco

Docket No. 52-021
MHI Ref: UAP-HF-11088

Subject: Submission of technical report of US-APWR RCCA Insertion Limit Load Test Report based on RAI response Question 03.09.05-34

Reference: 1) "Request for Additional Information No. 663-4996 Revision 0, SRP Section: 03.09.05 – Reactor Pressure Vessel Internals, Application Section: DCD, Tier 2 – Section 3.9.5," dated 11/15/2010.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "US-APWR RCCA Insertion Limit Load Test Report."

Enclosed are the responses to question 03.09.05-34 of the RAI (Reference 1).

In the response to the question 03.09.05-34, MHI committed to submit the technical report for RCC Guide Tube Mechanical Test by the end of March, 2011. The technical report MUAP-11012-P "US-APWR RCCA Insertion Limit Load Test Report" is being submitted electronically in enclosed compact disc ("CD").

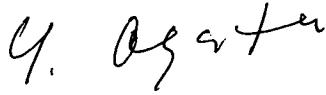
As indicated in the enclosed materials, this submittal contains information that MHI considers proprietary, and therefore should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. A non-proprietary version of the document is also being submitted with the information identified as proprietary redacted and replaced by the designation "[]" (brackets).

In accordance with the NRC submittal procedures, this letter includes the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests 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 this submittal. His contact information is provided below.

DOB
MRO

Sincerely,



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

Enclosures:

1. Affidavit of Yoshiki Ogata
2. CD 1: "US-APWR RCCA Insertion Limit Load Test Report (MUAP-11012-P)"
-Version Containing Proprietary Information
3. CD 2: "US-APWR RCCA Insertion Limit Load Test Report (MUAP-11012-NP)"
-Version Not Containing Proprietary Information

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

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

Contact Information

C. Keith Paulson, Senior Technical Manager
Mitsubishi Nuclear Energy Systems, Inc.
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Monroeville, PA 15146
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Telephone: (412) 373-6466

Enclosure 1

Docket No. 52-021
MHI Ref: UAP-HF-11088

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, "US-APWR RCCA Insertion Limit Load Test Report", and have determined that portions of the document contain proprietary information that should be withheld from public disclosure. Those pages contain 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 as follows:
 - A. They include the know-how and outputs of analyses used by mathematical models developed at significant cost to MHI. It required the performance of detailed design calculations, supporting 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.
 - B. They include the information that is provided to MHI pursuant to licensing agreements with third parties (the "Licensors") for MHI's use and under the obligation to maintain their confidentiality. Furthermore, MHI has an ownership interest in the referenced information by having paid significant sums of money to the Licensors for the rights to the intellectual property therein such that public disclosure of the materials would adversely affect MHI's competitive position.
 - C. They include the information directly referred from books the copyrights of which are reserved.

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. 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 systems and components. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI and the Licensors 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 30th day of March, 2011.

A handwritten signature in black ink, appearing to read 'Y. Ogata', written in a cursive style.

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

ATTACHMENT 1

FILE CONTAINED IN CD

CD 1: "US-APWR RCCA Insertion Limit Load Test Report (MUAP-11012-P)"

-Version Containing Proprietary Information

CD 2: "US-APWR RCCA Insertion Limit Load Test Report (MUAP-11012-NP)"

-Version Not Containing Proprietary Information

Contents of CD

CD No.	Document No.	Title	File Size	Sensitivity Level
CD1	MUAP-11012-P.pdf	US-APWR RCCA Insertion Limit Load Test Report	6.9MB	Proprietary
CD2	MUAP-11012-NP.pdf	US-APWR RCCA Insertion Limit Load Test Report	4.9MB	Non-Proprietary