


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

April 1, 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-11093

Subject: Transmittal of the Technical Report entitled "US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation" (MUAP-10020, Revision 1)

Reference: 1) UAP-HF-10317, Transmittal of the Technical Report entitled "US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation" (MUAP-10020, Revision 0)

The purpose of this letter is to formally transmit the technical report entitled "US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation" (MUAP-10020, Revision 1) from Mitsubishi Heavy Industries, Ltd. ("MHI") to the U.S. Nuclear Regulatory Commission ("NRC").

As indicated in the enclosed materials, this technical report 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 "[]".

Enclosed are a copy of the proprietary version (Enclosure 2), a copy of the non-proprietary version (Enclosure 3), and 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 the submittals. His contact information is below.

Sincerely,



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

DOB1
NRC

Enclosures:

1. Affidavit of Yoshiki Ogata
2. CD1: US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation (MUAP-10020-P Rev.1)
- Version Containing Proprietary Information
3. CD2: US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation (MUAP-10020-NP Rev.1)
- 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
Mitsubishi Nuclear Energy Systems, Inc.
300 Oxford Drive, Suite 301
Monroeville, PA 15146
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ENCLOSURE 1

Docket No.52-021
MHI Ref: UAP-HF-11093

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 Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation" dated April 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 technique of the air conditioning, heating, cooling, and ventilation systems calculation related to the US-APWR specific design, developed by MHI.
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 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 the development of the methodology related to the air conditioning, heating, cooling, and ventilation systems calculation. 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 associated with the safety-related air conditioning, heating, cooling, and ventilation systems.

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 1st day of April, 2011.

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is written in a cursive, somewhat stylized font.

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

ATTACHMENT 1

FILE CONTAINED IN CD 1

**CD 1: “US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation (MUAP-10020-P Rev.1)”
– Version Containing Proprietary Information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
MUAP-10020-P_R1.pdf	1.3 MB	Proprietary

ATTACHMENT 2

FILE CONTAINED IN CD 2

**CD 2: "US-APWR Safety-Related Air Conditioning, Heating, Cooling, and Ventilation Systems Calculation" (MUAP-10020-NP Rev.1)"
– Version Not Containing Proprietary Information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
MUAP-10020-NP_R1.pdf	0.4 MB	Non-Proprietary