


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

April 28, 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-11128

Subject: Transmittal of Revised Responses to Three(3) Questions in 2nd set RAIs and 4th set RAIs on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)"

Reference: [1] "REQUEST FOR ADDITIONAL INFORMATION US-APWR TOPICAL REPORT: LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0), dated March 15, 2010.
[2] "REQUEST FOR ADDITIONAL INFORMATION US-APWR Topical Report: LARGE BREAK LOCA Code Applicability, MUAP- 07011-P (R0), dated August 8, 2010.
[3] MHI's Response to the NRC's Request for 2nd Set Additional Information on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)", UAP-HF-10130, dated May 24, 2010.
[4] MHI's Response to the NRC's Request for 4th Set of Additional Information on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)", UAP-HF-10247, dated September 13, 2010.
[5] AUDIT PLAN FOR THE UNITED STATES - ADVANCED PRESSURIZED WATER REACTOR DESIGN CERTIFICATION LBLOCA Topical Report MUAP-07011-P (Rev. 0) April 5 - 6, 2011

With this letter, Mitsubishi Heavy Industries, LTD. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the document entitled "Transmittal of Revised Responses to Three(3) Questions in 2nd set RAIs and 4th set RAIs on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)" ".

Enclosure-2 is the revised response to Question 35 in 2nd set RAIs (Reference 1). Enclosure-3 provides the improved responses to items "a" and "b" in RAI-2 (Reference 2) and a supplemental document to RAI-2 (Reference 2). These responses are substituted for the previous responses submitted by UAP-HF-10130 on May 24, 2010 (Reference 3) and UAP-HF-10247 on September 13, 2010 (Reference 4) in order to reflect the discussion with the NRC at the meeting on April 5 and 6, 2011 (Reference 5).

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

This letter includes a copy of the proprietary version (Enclosure 2 and 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 and Enclosure 3 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.

Sincerely,



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

Enclosures:

- 1 – Affidavit of Yoshiaki Ogata
- 2 – Amended Response to Question 35 in 2nd set RAIs on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)" (proprietary)
- 3 – Revised Responses to RAI-2 in 4th set RAIs on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)" (proprietary)

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
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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 "Transmittal of Revised Responses to Three(3) Questions in 2nd set RAIs and 4th set RAIs on US-APWR Topical Report "LARGE BREAK LOCA CODE APPLICABILITY REPORT, MUAP- 07011-P (R0)"" and have determined that portions of the report 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 technical report 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 in the report identified as proprietary by MHI 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 codes and files developed by MHI for the fuel of the US-APWR and also contains information provided to MHI under license from the Japanese Government. These codes and files were developed at significant cost to MHI, since they required the performance of detailed calculations, 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 and the Japanese Government.
5. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of supporting the NRC staff's review of MHI's Application for certification of its US-APWR Standard Plant Design.
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 fuel systems and components. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI 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 28th day of April, 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 on the "a".

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