


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-11129

Subject: MHI's 15th Response to NRC's Request for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P(R1)

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the document entitled "MHI's 15th Response to NRC's Request for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P(R1)".

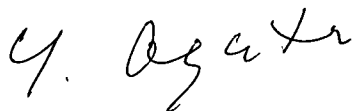
The material in Enclosure 2 provides MHI's response to the NRC's "Request for Additional Information (RAI), US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P(R1)," dated April 8, 2011. This RAI is referenced as the eleventh set of RAIs for this Topical Report. Enclosure 3 provides a TWINKLE-M input file related to the written RAI responses provided in Enclosure 2.

As indicated in the enclosed materials, Enclosures 2 and 3 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.

This letter includes a copy of the proprietary version of the RAI response (Enclosure 2), additional proprietary supporting documentation on an OSM (Enclosure 3), and the Affidavit of Yoshiaki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests that all material designated as "Proprietary" in Enclosures 2 and 3 be withheld from 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.

Sincerely,



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

DOB
MRO

Enclosures:

1. Affidavit of Yoshiki Ogata
2. MHI's 15th Response to NRC's Request for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1) (proprietary)
3. CD1: "OSM: Additional Supporting Documentation" (proprietary)

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-11129

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, being duly sworn according to law, depose and 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 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 "MHI's 15th Response to NRC's Request for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P(R1)", and the enclosed Optical Storage Medium ("OSM"), all dated April 28, 2011, and have determined that the document contains proprietary information that should be withheld from public disclosure. The first page of the document and the label of the OSM indicate that information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).
3. The basis for holding the referenced information confidential is that it describes the unique design of the safety analysis, developed by MHI (the "MHI Information").
4. The MHI Information is not used in the exact form by any of MHI's competitors. This information was developed at significant cost to MHI, since it required the performance of research and development and detailed design for its software and hardware extending over several years. Therefore public disclosure of the materials would adversely affect MHI's competitive position.
5. The referenced information has in the past been, and will continue to be, held in confidence by MHI and is always subject to suitable measures to protect it from unauthorized use or disclosure.
6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information.
7. 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.
8. 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 and testing of new 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.

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