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TOKYO, JAPAN

May 13, 2011

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

Docket No. 52-021
MHI Ref: UAP-HF-11137

Subject: Implementation of NRC Interim Staff Guidance ISG-011

Dear Mr. Jeffrey A. Ciocco:

Mitsubishi Heavy Industries, Ltd. (MHI) recently submitted Revision 3 to the US-APWR Design Control Document. Contained within that revision were several design changes that were discussed and evaluated in an internal Design Centered Working Group meeting with both Luminant and Dominion. Subsequently, those approved changes were discussed with the NRC staff prior to incorporation in Revision 3 of the DCD.

As a result of the interactions described above to review and incorporate proposed changes, MHI completed Revision 3 of the DCD and invoked the provisions of NRC Interim Staff Guidance ISG-011 for the US-APWR DCD effective March 31, 2011. Any remaining proposed design changes were processed in accordance with the ISG-11 criteria. None were found to meet one or more of the ISG-011 criteria and will be deferred in accordance with internal guidance.

In summary, MHI has established March 31, 2011 (DCD Revision 3), as the licensing-basis freeze point for the US-APWR DCD. Proposed changes to the US-APWR after this freeze point will be deferred unless the change meets one or more of the following criteria:

- Changes required to be submitted for NRC review under ISG-011
- Changes required to support Requests for Additional Information and Open Items needed to complete the DCD Safety Review
- Changes that are errata or consistency corrections

If circumstances dictate any deviation from this freeze point process, the NRC will be notified in writing. If there are any questions regarding this, please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc. at (412) 373-6466.

Sincerely yours,



Yoshiki Ogata
General Manager – APWR Promoting Department
Mitsubishi Heavy Industries, Ltd.

DOB /
NRO