



MITSUBISHI HEAVY INDUSTRIES, LTD.

16-5, KONAN 2-CHOME, MINATO-KU

June 29, 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-11199

Subject: ERG Development Schedule Impact on Confirmatory Audit for US-APWR PAM List

- References:**
- 1) "Notice of Forthcoming Public and Closed Meeting with Mitsubishi Heavy Industries, LTD., To Discuss the Review Status and Design Changes Related to the United States – Advanced Pressurized Water Reactor Digital Instrumentation and Controls", dated April 28, 2011 (ML111180139).
 - 2) MHI Letter UAP-HF-09340 from Y. Ogata (MHI) to U.S. NRC, "MHI's Response to US-APWR DCD RAI No. 297-2287 Revision 2", dated July 3, 2009 (ML091890966).
 - 3) MUAP-10010, "US-APWR Procedure Development Implementation Plan", Revision 0, dated April 2010 (ML101470276).
 - 4) MHI Letter UAP-HF-09501 from Y. Ogata (MHI) to U.S. NRC, "MHI's Response to US-APWR DCD RAI No. 463-3746 Revision 0 and Open Item OI-SRP16-CTSB-1769/284", dated October 28, 2009 (ML093070292).

During the Mitsubishi Heavy Industries, Ltd. (MHI) meeting with the NRC on May 11-12, 2011 (Reference 1), the NRC indicated a desire to perform an audit to confirm that the Post Accident Monitoring (PAM) list provided in Chapter 7 of the US-APWR DCD corresponds to the instrumentation utilized in the US-APWR Emergency Response Guidelines (ERGs). As described in the response to RAI 297-2287 Question No. 15.0.0-12 (Reference 2) and reiterated in MUAP-10010(R0) (Reference 3), MHI is developing the US-APWR ERGs in a phased approach. The initial Phase-1 draft ERGs were completed at the end of 2009. The Phase-2 improvement stage of ERG development is currently in progress and scheduled for completion by the end of 2011. However, as previously indicated in the response to RAI 463-3746 Question No. 16-299 (Reference 4), MHI does not expect that additional PAM instruments will need to be added to the bounding list of RG 1.97 PAM instruments as a result of the completion of the ERGs, Emergency Operating Procedures (EOPs), and Abnormal Operating Procedures (AOPs). Therefore, MHI believes an audit for the consistency between the PAM list and the current draft ERGs is possible in November, 2011. MHI will prepare a consistency evaluation which compares the DCD PAM list and the PAM instruments used in the ERGs, EOPs, and AOPs. During the audit, MHI will present the evaluation.

DOB
MRO

Sincerely,

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".

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

CC: J. A. Ciocco
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