MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

September 15, 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-11316

Subject: **Transmittal of the Technical Reports "Containment Internal Structure: Design Criteria for SC Walls" (MUAP-11019)**

References: (1) Letter (MHI Ref: UAP-HF-11196) from Y. Ogata (MHI) to U.S. NRC, "Transmittal of the Technical Report "Containment Internal Structure Design and Validation Methodology" (MUAP-11013), Revision 0" dated June 29, 2011

In Reference 1, Mitsubishi Heavy Industries, Ltd. (MHI) provided design and validation methodology of Containment Internal Structure for the US-APWR. Based on the plan, this technical report is Task 2-A of four tasks which are going to transmit to the U.S. Nuclear Regulatory Commission ("NRC").

With this letter, MHI transmits to the NRC a technical report which is scheduled for submittal in September, 2011:

- "Containment Internal Structure: Design Criteria for SC Walls" (MUAP-11019), Revision 0

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,

Y. Ogata

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

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NRO

Enclosures:

1. Affidavit

2. CD 1: "Containment Internal Structure: Design Criteria for SC Walls" (Proprietary (Non Public) Version)

3. CD 2: "Containment Internal Structure: Design Criteria for SC Walls" (Non-Proprietary (Public) Version)

The files contained in CDs are listed in Attachment 1 hereto.

CC : J. A. Ciocco
C. K. Paulson

Contact Information
C. Keith Paulson, Senior Technical Manager
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ENCLOSURE 1

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 documentations 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 report, "Containment Internal Structure: Design Criteria for SC Walls " MUAP-11019-P/NP (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).

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 design developed by MHI for the containment internal structure of the US-APWR. That design was developed at significant cost to MHI, since it required the performance of detailed design 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.

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 the containment internal structure. 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 15th day of September, 2011.

Y. Ogata

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

ATTACHMENT 1

FILES CONTAINED IN CDs

CD 1: "Containment Internal Structure: Design Criteria for SC Walls" (Proprietary (Non Public) Version)

Contents of CD

File Name	Size	Sensitivity Level
MUAP-11019(R0)_Proprietary.pdf	12.6 MB	(Proprietary Version)

CD 2: "Containment Internal Structure: Design Criteria for SC Walls" (Non-Proprietary (Public) Version)

Contents of CD

File Name	Size	Sensitivity Level
MUAP-11019(R0)_Non-Proprietary.pdf	33.1 MB	(Non-Proprietary Version)