


MITSUBISHI HEAVY INDUSTRIES, LTD.
16-5, KONAN 2-CHOME, MINATO-KU
TOKYO, JAPAN

May 11, 2012

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-12122

Subject: MHI Topical Report MUAP-07010 "Non-LOCA Methodology Revision 4"

Reference: 1) "MHI's Response to US-APWR DCD RAI No. 911-6326 Revision 3 (SRP 15.4.8)", MHI letter UAP-HF-12087, dated April 5, 2012 (ML12103A267 and ML12103A268).

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the Optical Storage Medium ("OSM") entitled "Non-LOCA Methodology Topical Report MUAP-07010 (R4)".

Enclosed is a revision to MUAP-07010 "Non-LOCA Methodology", previously transmitted via Reference 1. This new revision reflects an update of the list of references. This topical report supplements the materials provided in the "Design Control Document for the US-APWR" ("DCD"), and is referenced in the DCD.

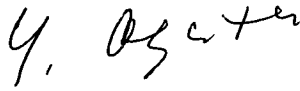
As indicated in the enclosed materials, the enclosed OSM contains information that MHI considers proprietary, and therefore should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. Accordingly, the topical report is being submitted in two versions on separate OSMs. One version (Enclosure 2) contains the complete proprietary version of the topical report. The non-proprietary version of the topical report is included in Enclosure 3. In the non-proprietary version, the proprietary information, bracketed in the proprietary version, is replaced by the designation "[]".

This letter includes a proprietary OSM (Enclosure 2), a non-proprietary OSM (Enclosure 3), and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests that all material designated as "Proprietary" in Enclosure 2 be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

Please contact Mr. Joseph Tapia, General Manager of Licensing Department, Mitsubishi Nuclear Energy Systems, Inc., if the NRC has questions concerning any aspect of this submittal. His contact information is provided below.

DOB
NPD

Sincerely,



Yoshiki Ogata
Director - APWR Promoting Department
Mitsubishi Heavy Industries, Ltd.

Enclosures:

1. Affidavit of Yoshiki Ogata
2. OSM 1: Non-LOCA Methodology Topical Report MUAP-07010 (R4) (proprietary)
3. OSM 2: Non-LOCA Methodology Topical Report MUAP-07010 (R4) (non-proprietary)

The files contained on OSM 1 and OSM 2 are listed in Attachments 1 and 2 hereto, respectively.

CC: J. A. Ciocco
J. Tapia

Contact Information

Joseph Tapia, General Manager of Licensing Department
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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF- 12122

MITSUBISHI HEAVY INDUSTRIES, LTD.

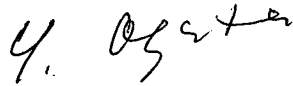
AFFIDAVIT

I, Yoshiki Ogata, being duly sworn according to law, depose and state as follows:

1. I am Director, 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 OSM entitled "OSM 1: Non-LOCA Methodology Topical Report MUAP-07010 (R4)", dated May 11, 2012, and have determined that the OSM contains 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 OSM indicates 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 11th day of May, 2012.

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is written in a cursive style with a small dot above the "Y" and a long horizontal stroke extending to the right.

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

ATTACHMENT 1

Docket No. 52-021
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FILES CONTAINED ON OSM 1

**OSM 1: Non-LOCA Methodology Topical Report MUAP-07010 (R4)
(proprietary)**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
1. 001_MUAP-07010-P_R4.pdf	2,325 KB	Proprietary

ATTACHMENT 2

Docket No. 52-021
MHI Ref: UAP-HF-12122

FILES CONTAINED ON OSM 2

**OSM 2: Non-LOCA Methodology Topical Report MUAP-07010 (R4)
(non-proprietary)**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
1. 001_MUAP-07010-NP_R4.pdf	1,842 KB	Non-Proprietary