



MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

August 31, 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-12242

Subject: Transmittal of the Technical Report entitled "US-APWR Sump Debris Chemical Effects Test Results" (MUAP-08011, Revision 2)

- References:**
- [1] MHI Letter UAP-HF-11449, "Updated Closure Plan for Issues Associated with GSI-191 for the US-APWR Design Certification," dated December 21, 2011 (ML11362A464).
 - [2] MHI Letter UAP-HF-12139, "Transmittal of the Technical Report entitled "US-APWR Sump Debris Chemical Effects Test Results" (MUAP-08011, Revision 1)", dated June 1, 2012 (ML12159A233).
 - [3] MHI Letter UAP-HF-12171, "Re-transmittal of non-proprietary version of Technical Report entitled "US-APWR Sump Debris Chemical Effects Test Results" (MUAP-08011-NP, Revision 1)", dated June 21, 2012 (ML12179A402).

The purpose of this letter is to formally transmit the revised Technical Report entitled "US-APWR Sump Debris Chemical Effects Test Results" (MUAP-08011, Revision 2) from Mitsubishi Heavy Industries, Ltd. ("MHI") to the U.S. Nuclear Regulatory Commission ("NRC") as scheduled in Enclosure 2 (p. 13) of Reference 1.

On June 1 and 21, 2012, MHI submitted to the NRC proprietary and non-proprietary versions of Technical Report "US-APWR Sump Debris Chemical Effects Test Results" (MUAP-08011-P and NP, Revision 1) (References 2 and 3). However, MHI received the following comments from the NRC staff in late June 2012:

- 1) Section 3.4.1 (page 31). The text refers to ASTM Standard G4 on corrosion test specimens. The correct standard for this is G1, as listed in the References.
- 2) Appendix A, Chemical Effects Test Data, was not included in the report.

MHI sincerely apologizes for any confusion caused by these errors and submits MUAP-08011, Revision 2 as a corrected version of MUAP-08011, Revision 1. Please note that the only changes in Revision 2 enclosed with this letter are reflection of the above NRC staff's comments and the update of a reference revision number in "6.0 REFERENCES" of the report.

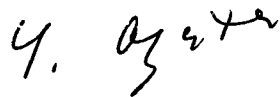
As indicated in the enclosed materials, this document contains information that MHI considers proprietary, and therefore should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. A non-proprietary version of the document is also being submitted with the information identified as proprietary redacted and replaced by the designation "[]".

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This letter includes a copy of the proprietary version of the technical report (Enclosure 2), a copy of the non-proprietary version of the technical report (Enclosure 3), and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests that all materials designated as "Proprietary" in Enclosure 2 be withheld from public 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.

Sincerely,



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

Enclosures:

1. Affidavit of Yoshiki Ogata
2. CD1: US-APWR Sump Debris Chemical Effects Test Results (MUAP-08011-P Rev. 2)
- Version Containing Proprietary Information
3. CD2: US-APWR Sump Debris Chemical Effects Test Results (MUAP-08011-NP Rev. 2)
- Version **Not** Containing Proprietary Information

The file contained in each CD is listed in Attachments 1 and 2 hereto.

CC: J. A. Ciocco
J. Tapia

Contact Information

Joseph Tapia, General Manager of Licensing Department
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ENCLOSURE 1

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, 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 document entitled "US-APWR Sump Debris Chemical Effects Test Results" dated August, 2012, and have determined that portions of the document 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 document indicates that all information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).
3. The information identified as proprietary in the enclosed document 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 of the chemical effects evaluation and the strainer head loss and bypass test procedure related to the US-APWR design, developed by MHI and sub-vendors not used in the exact form by any 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.
5. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of information to the NRC staff.
6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. Other than through the provisions in paragraph 3 above, MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.
7. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without incurring the costs or risks associated with the design of the subject systems. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MHI in the U.S. nuclear plant market:

- A. Loss of competitive advantage due to the costs associated with the development of the test configuration, methodology and the test procedure. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.
- B. Loss of competitive advantage of the US-APWR created by benefits of enhanced plant safety, and reduced operation and maintenance costs associated with the safety and the plant specific strainer system design.

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 31st day of August 2012.



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

ATTACHMENT 1

FILE CONTAINED IN CD 1

**CD 1: "US-APWR Sump Debris Chemical Effects Test Results (MUAP-08011-P Rev. 2)"
– Version Containing Proprietary Information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
001 MUAP-08011-P(R2).pdf	28 MB	Proprietary
002 MUAP-08011-P(R2).pdf	28 MB	Proprietary
003 MUAP-08011-P(R2).pdf	47 MB	Proprietary
004 MUAP-08011-P(R2).pdf	25 MB	Proprietary

ATTACHMENT 2

FILE CONTAINED IN CD 2

**CD 2: "US-APWR Sump Debris Chemical Effects Test Results (MUAP-08011-NP Rev. 2)"
– Version Not Containing Proprietary Information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
001 MUAP-08011-NP(R2).pdf	26 MB	Non-Proprietary
002 MUAP-08011-NP(R2).pdf	28 MB	Non-Proprietary
003 MUAP-08011-NP(R2).pdf	33 MB	Non-Proprietary
004 MUAP-08011-NP(R2).pdf	6 MB	Non-Proprietary