



MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

September 28, 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-12271

Subject: Revision 4 of the Technical Report MUAP-10023 "Initial Type Test Result of Class 1E Gas Turbine Generator System"

- References:
- 1) Letter MHI Ref: UAP-HF-11318 from Y. Ogata to U.S. NRC, "Technical Report MUAP-10023 'Initial Type Test Result of Class 1E Gas Turbine Generator System' Revision 3", dated September 21, 2011 (ML11271A052).
 - 2) Letter MHI Ref: UAP-HF-11180 from Y. Ogata to U.S. NRC, "MHI's Responses to US-APWR DCD RAI No. 726-5640 Revision 2 (SRP 08.03.01)", dated June 13, 2011 (ML11166A006).
 - 3) Letter MHI Ref: UAP-HF-12201 from Y. Ogata to U.S. NRC, "MHI's Response to US-APWR DCD RAI No. 876-6210 Revision 3 (SRP 08.03.01)", dated July 20, 2012 (ML12216A024).

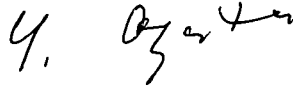
With this letter, Mitsubishi Heavy Industries, LTD. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) Revision 4 of the technical report entitled "Initial Type Test Result of Class 1E Gas Turbine Generator System" which was previously submitted in September 2011 as Revision 3 (Reference 1). The technical report was revised based on MHI's responses to US-APWR DCD RAI No. 726-5640 (Reference 2), and MHI's response to US-APWR DCD RAI No. 876-6210 (Reference 3).

As indicated in the enclosed materials, this technical report contains information that MHI, Kawasaki Heavy Industries, LTD. (KHI), and Engine Systems, Inc. (ESI) consider proprietary, and therefore 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. Accordingly, the technical report is being submitted in two versions, in separate compact discs. One version (in CD 1) contains the complete proprietary version of the technical report. A non-proprietary version of the technical report is enclosed in CD 2. In the non-proprietary version, the proprietary information, bracketed in the proprietary version, is replaced by the designation "[]". In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the proprietary version of the technical report should 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 the submittals. His contact information is below.

D081
NRD

Sincerely,

A handwritten signature in black ink, appearing to read "Y. Ogata". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

Enclosures:

- 1 - Affidavit of Yoshiki Ogata
- 2 - CD 1: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-P, Rev.3) – Version that contains proprietary information
- 3 - CD 2: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-NP, Rev.3) – Version that does not contain proprietary information

The files contained in each CD are listed in Attachments 1 and 2 hereto.

CC: J. A. Ciocco
J. Tapia

Contact Information

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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-12271

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

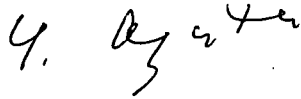
I, Yoshiki Ogata, state as follows:

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 "Initial Type Test Result of Class 1E Gas Turbine Generator System" dated September 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 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, Kawasaki Heavy Industries, LTD. (KHI), and Engine Systems, Inc. (ESI) 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 gas turbine generator system, developed by MHI, KHI, and ESI and not used in the exact form by any of MHI's, KHI's, and ESI's competitors. This information was developed at significant cost to MHI, KHI, and ESI, since it required the performance of Research and Development, 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 supporting 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, KHI, and ESI.
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 technical report 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 development of the class 1E gas turbine generator. Providing public access to such information permits competitors to duplicate or mimic the technology 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 class 1E gas turbine generator.

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 28th day of September, 2012.

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 horizontal stroke.

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

ATTACHMENT 1

FILES CONTAINED IN CD 1

**CD 1: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-P, Rev.4) - Version that contains proprietary information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
001 Initial Type Test Result of Class 1E GTG System-P(R4)_1.pdf	27.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_2.pdf	42.4MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_3.pdf	34.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_4.pdf	43.8MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_5.pdf	48.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_6.pdf	42.7MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_7.pdf	47.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_8.pdf	35.7MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_9.pdf	39.5MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_10.pdf	37.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_11.pdf	41.9MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_12.pdf	36.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R4)_13.pdf	36.4MB	Proprietary

ATTACHMENT 2

FILES CONTAINED IN CD 2

**CD 2: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-NP, Rev.4) - Version that does not contain proprietary
information**

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_1.pdf	47.5MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_2.pdf	43.5MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_3.pdf	43.6MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_4.pdf	48.7MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_5.pdf	42.9MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_6.pdf	42.8MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_7.pdf	7.0MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R4)_8.pdf	0.4MB	Non-Proprietary