


MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

November 29, 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-12315

Subject: Revision 3 of the Technical Report MUAP-07027 "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals"

Reference:

- 1) "REQUEST FOR ADDITIONAL INFORMATION No. 916-6343 REVISION 3, SRP Section:03.09.02 – Dynamic Testing and Analysis of Systems Structures and Components, Application Section 3.9.2", dated March 29, 2012
- 2) "MHI's Amended Response to US-APWR DCD RAI No. 916-6343 REVISION 3", UAP-HF-12252, dated September 4, 2012

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the Technical Report MUAP-07027 Revision 3 entitled "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals". The changes to the Technical Report that were stated in MHI's response to RAI916-6343 have been incorporated into this revision.

As indicated in the enclosed materials, this technical report contains information that MHI 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.

Sincerely,



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

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NRO

Enclosures:

- 1 - Affidavit of Yoshiki Ogata
- 2 - CD 1: "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals"
(MUAP-07027-P, Rev.3) – Version that contains proprietary information
- 3 - CD 2: "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals"
(MUAP-07027-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

Joseph Tapia, General Manager of Licensing Department
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ENCLOSURE 1

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MITSUBISHI HEAVY INDUSTRIES, LTD.

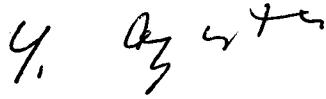
AFFIDAVIT

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 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 "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals MUAP-07027 REVISION 3" 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 methodologies developed by MHI for the US-APWR reactor internal design. These were developed at significant cost to MHI, since they required the performance of detailed 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.
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 new fuel 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 29th day of November, 2012.

A handwritten signature in black ink, appearing to read 'Y. Ogata' with a stylized flourish at the end.

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

ATTACHMENT 1

FILES CONTAINED IN CD 1

CD 1: "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals" (MUAP-07027-P, Rev.3) - Version that contains proprietary information

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
001 MUAP-07027-P-R3_1.pdf	27.3MB	Proprietary

ATTACHMENT 2

FILES CONTAINED IN CD 2

CD 2: "Comprehensive Vibration Assessment Program for US-APWR Reactor Internals" (MUAP-07027-NP, Rev.3) - Version that does not contain proprietary information

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
001 MUAP-07027-NP(R3)_1.pdf	47.5MB	Non-Proprietary