



MITSUBISHI HEAVY INDUSTRIES, LTD.

16-5, KONAN 2-CHOME, MINATO-KU

TOKYO, JAPAN

June 28, 2013

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-13142

Subject: Transmittal of revised Technical Report "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3"

Reference: 1) Technical Report "Probabilistic Evaluation of Turbine Valve Test Frequency (MUAP-07029, Revision 2)," Ref: UAP-HF-11009 dated January, 2011, ML110280155.
2) "MHI's Response to US-APWR DCD RAI No. 574-4633 Revision 2," MHI Ref: UAP-HF-13110 dated May, 2013.

With this letter, Mitsubishi Heavy Industries, Ltd. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) a document entitled "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3."

The enclosed document fulfills commitments regarding MUAP-07029 stated in Reference 2.

This letter includes a copy of the proprietary (non-public) version of the document (Enclosure 2), a copy of the non-proprietary (public) version of the document (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 CFR § 2.390 (a)(4).

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

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 below.

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MRO

Sincerely,



Yoshiaki Ogata,
Executive Vice President
Mitsubishi Nuclear Energy Systems, Inc.
On behalf of Mitsubishi Heavy Industries, Ltd.

Enclosure:

1. Affidavit of Yoshiaki Ogata
2. CD1: "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3"
(proprietary version)
3. CD2: "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3"
(non proprietary version)

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

Docket No. 52-021
MHI Ref: UAP-HF-13142

MITSUBISHI HEAVY INDUSTRIES, LTD. AFFIDAVIT

I, Yoshiki Ogata, state as follows:

1. I am Executive Vice President of Mitsubishi Nuclear Energy Systems, Inc., and have been delegated the function of reviewing Mitsubishi Heavy Industries, Ltd.'s (MHI) 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 "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3" dated June 2013, 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 by MHI for performing the turbine rotor design of the US-APWR.
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 development of turbine rotor materials.
 - B. Loss of competitive advantage of the US-APWR created by benefits of information of turbine rotor material specification.

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 June, 2013.

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

Yoshiaki Ogata,
Executive Vice President
Mitsubishi Nuclear Energy Systems, Inc.

ATTACHMENT 1

FILE CONTAINED IN CD 1

CD 1: "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3"
(proprietary version)

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
MUAP_07029-P (R3) Valve Test.pdf	0.6 MB	Proprietary

ATTACHMENT 2

FILE CONTAINED IN CD 2

CD 2: "Probabilistic Evaluation of Turbine Valve Test Frequency, MUAP-07029, Revision 3"
(non-proprietary version)

Contents of CD

<u>File Name</u>	<u>Size</u>	<u>Sensitivity Level</u>
130625_MUAP-07028-NP(R2) .pdf	0.2 MB	Non-Proprietary