MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

August 13, 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-13206

Subject: **MHI Technical Report MUAP-07026 "Mitsubishi Reload Evaluation Methodology" Revision 3**

References:
1) "MHI's Response to US-APWR DCD RAI No. 882-6237 Revision 3 (SRP 15.0)", MHI letter UAP-HF-12009, dated January 31, 2012 (ML12065A197).
2) "Supplemental Documentation in Support of MHI's Revised 15th Response to NRC's Requests for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1)", MHI letter UAP-HF-11277, dated August 31, 2011 (ML11255A144).
3) "Technical Report on Mitsubishi Reload Evaluation Methodology (MUAP-07026) Submitted in Support of US-APWR Design Certification Application", MHI letter UAP-HF-07187, dated December 31, 2007 (ML08029227).
4) "MHI's Response to US-APWR DCD RAI No. 297-2287 Revision 2, MHI letter UAP-HF-09340, dated July 3, 2009 (ML091890966).

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the Optical Storage Medium ("OSM") entitled "Mitsubishi Reload Evaluation Methodology Technical Report MUAP-07026 (R3)".

Enclosed is a revision to MUAP-07026 "Mitsubishi Reload Evaluation Methodology", previously transmitted via References 1, 2, and 3. This new revision incorporates changes to the report committed to in the response to Questions 15.0.0-20 and 15.0.0-23 of Reference 4. This technical report is referenced in the "Design Control Document for the US-APWR" ("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 technical report. The non-proprietary version of the technical 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).

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NRO

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,

Y. Ogata

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

Enclosures:

1. Affidavit of Yoshiki Ogata
2. OSM 1: Mitsubishi Reload Evaluation Methodology Technical Report MUAP-07026 (R3) (proprietary)
3. OSM 2: Mitsubishi Reload Evaluation Methodology Technical Report MUAP-07026 (R3) (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

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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-13206

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, being duly sworn according to law, depose and 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 OSM entitled " Mitsubishi Reload Evaluation Methodology Technical Report MUAP-07026 (R3)", dated August 2013, 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 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 information and safety analysis methodology, developed by MHI and 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.

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 the US-APWR safety analysis. Providing public access to such information permits competitors to duplicate or mimic the safety analysis evaluation information without incurring the associated costs.

B. Loss of competitive advantage of the US-APWR created by benefits of enhanced US-APWR development costs associated with safety analysis methodology.

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 13th day of August, 2013.

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

ATTACHMENT 1

Docket No. 52-021
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FILES CONTAINED ON OSM 1

OSM 1: Mitsubishi Reload Evaluation Methodology Technical Report MUAP-07026 (R3) (proprietary)

Contents of CD

	File Name	Size	Sensitivity Level
1.	001_MUAP-07026-P_R3.pdf	725 KB	Proprietary

ATTACHMENT 2

Docket No. 52-021
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FILES CONTAINED ON OSM 2

OSM 2: Mitsubishi Reload Evaluation Methodology Technical Report MUAP-07026 (R3) (non-proprietary)

Contents of CD

	File Name	Size	Sensitivity Level
1.	001_MUAP-07026-NP_R3.pdf	389 KB	Non-Proprietary