MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

November 21, 2013

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Perry Buckberg

Docket No. 52-021
MHI Ref: UAP-HF-13267

Subject: MHI's Amended Response to US-APWR DCD RAI No. 107-1293 Revision 0 (SRP 03.09.04)

References: 1) "Request for Additional Information No. 107-1293 Revision 0, SRP Section: 03.09.04 – Control Rod Drive Systems, Application Section: 3.9.4," dated November 24, 2008
2) UAP-HF-11257, "Amended MHI's Response to US-APWR DCD RAI No. 107-1293 Revision 0 (SRP 03.09.04)" dated August 11, 2011
3) UAP-HF-13041, "Amended MHI's Response to US-APWR DCD RAI No. 107-1293 Revision 0 (SRP 03.09.04)" dated March 4, 2013

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Amended Response to Request for Additional Information No. 107-1293 Revision 0"

Enclosed are the fourth amended responses to Questions No. 1293-01, 1293-06 and 1293-07 of the RAI No. 107-1293 contained within Reference 1. These amended responses are submitted to update the previous maximum CRDM deflection based on the latest seismic conditions used in the US-APWR standard design and supersede the previous responses to the questions submitted in Reference 2 and Reference 3 in their entirety. The enclosed documents do not change the responses to the other questions contained within Reference 1.

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. The proprietary information is bracketed by the designation "[ ]".

This letter includes a copy of the proprietary version (Enclosure 2), a copy of the non-proprietary version (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).

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NRD

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 letter, his contact information is provided below.

Sincerely,

for T. Hashimoto

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

Enclosure:

1. Affidavit of Tatsuya Hashimoto
2. Amended Response to Request for Additional Information No. 107-1293 Revision 0 (Proprietary)
3. Amended Response to Request for Additional Information No. 107-1293 Revision 0 (Non-Proprietary)

CC: P. Buckberg
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-13267

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Tatsuya Hashimoto, state as follows:

1. I am Manager, US-APWR Project of Global Nuclear Project 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 "Amended Response to Request for Additional Information No. 107-1293 Revision 0" dated November 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 methodologies developed by MHI for the Control Rod Drive Mechanism design.

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 Control Rod Drive Mechanism design. Providing public access to such information permits competitors to duplicate or mimic the Control Rod Drive Mechanism design information without incurring the associated costs.

B. Loss of competitive advantage of the US-APWR created by benefits of enhanced US-APWR Control Rod Drive Mechanism development costs associated with the Control Rod Drive Mechanism.

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 21st day of November, 2013.

T. Hashimoto

Tatsuya Hashimoto
Manager- US-APWR Project
of Global Nuclear Project Department
Mitsubishi Heavy Industries, LTD