



MITSUBISHI HEAVY INDUSTRIES, LTD.
1-1, WADASAKI-CHO, 1-CHOME, HYOGO-KU,
KOBE, 652-8585 JAPAN

February 10, 2015

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

Attention: Mr. William Ward

Docket No. 52-021
MHI Ref: UAP-HF-15001

Subject: MHI's Amended Response to US-APWR DCD RAI No. 1091-7447 (SRP 07)

- Reference:** 1) "Request for Additional Information No. 1091-7447, SRP Section 07 – Instrumentation and Controls - Overview of Review Process - Application Section: 7," dated March 19, 2014, ML14078A302.
2) "MHI's Response to US-APWR DCD RAI No. 1091-7447 (SRP 07)," UAP-HF-14036, dated April 9, 2014, ML14100A340.
3) "AUDIT PLAN FOR US-APWR INSTRUMENTATION AND CONTROLS DESIGN November 17 - 21, 2014," dated November 10, 2014, ML14310A834.

With this letter, Mitsubishi Heavy Industries, Ltd. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) a document entitled "Amended Response to US-APWR DCD RAI No. 1091-7447 (SRP 07)."

Enclosed are the amended responses to the questions contained within Reference 1. This question was responded to previously in Reference 2. The response is amended to reflect the audit result in the week of November 17th, 2014 (Reference 3).

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. A non-proprietary version of the document is also being submitted with the information identified as proprietary redacted and replaced by the designation "[]."

This letter includes a copy of the proprietary version of the RAI response (Enclosure 2), a copy of the non-proprietary version of the RAI response (Enclosure 3), and the Affidavit of Atsushi Kumaki (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).

Please contact Mr. Joseph Tapia, General Manager of Regulatory Services, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of this submittal. His contact information is provided below.

DO81
NRC

Sincerely,



Atsushi Kumaki,
Deputy Director
Global Nuclear Project Department
Nuclear Energy Systems Division
Energy & Environment Domain
Mitsubishi Heavy Industries, Ltd.

Enclosures:

1. Affidavit of Atsushi Kumaki
2. Amended Response to US-APWR DCD RAI No. 1091-7447 (SRP 07)
(Proprietary)
3. Amended Response to US-APWR DCD RAI No. 1091-7447 (SRP 07)
(Non-Proprietary)

CC: W. Ward
J. Tapia

Contact Information

Joseph Tapia, General Manager of Regulatory Services
Mitsubishi Nuclear Energy Systems, Inc.
13860 Ballantyne Corporate Place, Suite 250
Charlotte, NC 28277
E-mail: joseph_tapia@mnes-us.com
Telephone: (704) 945-2740

ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-15001

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Atsushi Kumaki, being duly sworn according to law, depose and state as follows:

1. I am Deputy Director, Global Nuclear Project Department, Nuclear Energy Systems Division, Energy & Environment Domain, 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 documents entitled "Amended Response to US-APWR DCD RAI No. 1091-7447 (SRP 07)," dated February 2015 and have determined that 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 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 and methodology developed by MHI for performing the I&C 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 and testing 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 safety I&C system. Providing public access to such information permits competitors to duplicate or mimic the safety I&C system design 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 safety I&C system.

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 10th day of February, 2015.

A handwritten signature in black ink, appearing to read "Atsushi Kumaki". The signature is written in a cursive, flowing style.

Atsushi Kumaki,
Deputy Director
Global Nuclear Project Department
Nuclear Energy Systems Division
Energy & Environment Domain
Mitsubishi Heavy Industries, Ltd.