



MITSUBISHI HEAVY INDUSTRIES, LTD.

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August 18, 2016

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

Attention: Mr. William Ward

Docket No. 52-021
MHI Ref: UAP-HF-16003

Subject: MHI's Response to US-APWR DCD RAI No. 1097-8499 (SRP 07.01)

Reference: 1) "Request for Additional Information No. 1097-8499, SRP Section 07.01 – Instrumentation and Controls – Introduction - Application Section:," dated March 15, 2016, ML16075A445.

With this letter, Mitsubishi Heavy Industries, Ltd. (MHI) submits to the U.S. Nuclear Regulatory Commission (NRC) a document entitled "Response to US-APWR DCD RAI No. 1097-8499 (SRP 07.01)."

Enclosed are the responses to the 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. 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 Engineering and Regulatory Services, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of this letter. His contact information is provided below.

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NRD

Sincerely,



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

Enclosures:

1. Affidavit of Atsushi Kumaki
2. Response to US-APWR DCD RAI No. 1097-8499 (SRP 07.01)
(Proprietary)
3. Response to US-APWR DCD RAI No. 1097-8499 (SRP 07.01)
(Non-Proprietary)

CC: W. Ward
J. Tapia

Contact Information

Joseph Tapia, General Manager of Engineering and Regulatory Services
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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-16003

MITSUBISHI HEAVY INDUSTRIES, LTD.
AFFIDAVIT

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

1. I am Engineering Manager, 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 document entitled "Response to US-APWR DCD RAI No. 1097-8499 (SRP 07.01)," dated August, 2016 and have determined that the document 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 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 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 18th day of August, 2016.



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