MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

August 12, 2011

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-11264

Subject: MHI's Revised 15th Response to NRC's Requests for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1)

References:
1) "REQUEST FOR ADDITIONAL INFORMATION, US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P(R1)", dated April 8, 2011.
2) "MHI's 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-11129, dated April 28, 2011.
3) "United States - Advanced Pressurized Water Reactor Rod Ejection Accident Methodology Topical Report MUAP-07010 Revision 1, "Non-LOCA Methodology," Audit Plan August 4 - 5, 2011", dated July 28, 2011.

Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the Optical Storage Medium ("OSM") entitled "MHI's Revised 15th Response to NRC's Requests for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1)". In Reference 2, MHI provided the response to the NRC's Request for Additional Information ("RAI") in Reference 1. MHI has revised the response to Question REA-12 of Reference 2 based on prior discussion in conference calls between MHI and the NRC and additional NRC feedback provided during the August 4-5, 2011 audit (Reference 3). This letter transmits only the revised response for Question REA-12; the responses to the other questions transmitted by Reference 2 have not been revised.

As indicated in the enclosed materials, Enclosure 2 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.

This letter includes an OSM (Enclosure 2), which includes a copy of the proprietary version of the RAI response, 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).

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc., if the NRC has questions concerning any aspect of this submittal. His contact information is provided below.

DO81
NRO

Sincerely,

Y. Ogata

Yoshiki Ogata
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, Ltd.

Enclosures:

1. Affidavit of Yoshiki Ogata
2. CD: MHI's Revised 15th Response to NRC's Requests for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1) (proprietary)

The file contained on the CD is listed in Attachment 1 hereto.

CC: J. A. Ciocco
C. K. Paulson

Contact Information

C. Keith Paulson, Senior Technical Manager
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ENCLOSURE 1

Docket No. 52-021

MHI Ref: UAP-HF-11264

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, being duly sworn according to law, depose and state as follows:

1. I am General Manager, APWR Promoting 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 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 "MHI's Revised 15th Response to NRC's Requests for Additional Information, US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1)", dated July 29, 2011, and have determined that the document contains proprietary information that should be withheld from public disclosure. The first page of the document and the label on the CD indicates that information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

3. The basis for holding the referenced information confidential is that it describes the unique design of the safety analysis, developed by MHI (the "MHI Information").

4. The MHI Information is 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. Therefore public disclosure of the materials would adversely affect MHI's competitive position.

5. The referenced information has in the past been, and will continue to be, held in confidence by MHI and is always subject to suitable measures to protect it from unauthorized use or disclosure.

6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information.

7. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of supporting the NRC staff's review of MHI's application for certification of its US-APWR Standard Plant Design.

8. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without the costs or risks associated with the design and testing of new systems and components. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI in the U.S. nuclear plant market.

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 12th day of August, 2011.

Yoshiki Ogata,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

ATTACHMENT 1

Docket No. 52-021
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FILES CONTAINED ON CD

CD: MHI's Revised 15th Response to NRC's Requests for Additional Information on US-APWR Topical Report: Non-LOCA Methodology, MUAP-07010-P (R1) (proprietary)

Contents of CD

	File Name	Size	Sensitivity Level
1.	MHI_15th_RAI_Response_R1.pdf	2,239 KB	Proprietary