MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

September 12, 2011

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

Attention: Mr. Jeffery A. Ciocco

Docket No. 52-021
MHI Ref: UAP-HF-11312

Subject: MHI's Response to Non-public RAI No. 784-5887 on US-APWR DCD (SRP 04.05.02)

References: 1) "Request for Additional Information No. 784-5887 Revision 2, SRP Section: 04.05.02 – Reactor Internal and Core Support Structure Materials, Application Section: DCD, Tier 2 – Section 4.5.2" dated 07/25/2011.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Response to Non-public RAI No. 784-5887 Revision 2."

Enclosed are the responses to the question 04.05.02- 25 of the RAI (Reference 1).

As indicated in Reference 1, this RAI Question is official use only because it includes proprietary information. This submittal as the response to this non-public RAI also contains proprietary information, and 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 a copy of the proprietary response (Enclosure 2) 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) and 10 C.F.R.§ 9.17 (a)(4). A non-proprietary version of the response is not prepared because this RAI is non-public it-self.

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.

Sincerely,

Y. Ogata

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

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NRO

Enclosures:

1. Affidavit of Yoshiki Ogata
2. Response to Non-public RAI No. 784-5887, Revision 2 (Proprietary)

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-11312

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, 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 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 Non-public RAI No. 784-5887, Revision 2", dated September 12, 2011, and have determined that whole part of document should be withheld from public disclosure. All pages are identified with the label "Propritary" on the top of the page to 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 are as follows:

   A. They include the know-how and outputs of analyses developed with significant cost to MHI. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.

   B. They include the information referred from documents the copyrights of which are reserved by third parties.

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. 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 of new systems and components. Disclosure of the information identified as proprietary would therefore have negative impacts on the competitive position of MHI and the Licensors 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 September 2011.

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