MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

June 12, 2012

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-12152

Subject: MHI's Revised Responses to US-APWR DCD RAI No. 891-6268 REVISION 3 Questions 17.04-66 and 17.04-67 (SRP 17.04)

Reference:
1) "Request for Additional Information No. 891-6268 Revision 3, SRP Section: 17.04 - Reliability Assurance Program (RAP), Application Section: 17.4 Reliability Assurance Program," dated January 17, 2012.
2) Letter MHI Ref: UAP-HF-12086 from Y. Ogata to U.S. NRC, "MHI's Reponses to US-APWR DCD RAI No.891-6268 REVISION 3 (SRP 17.04)", dated April 24, 2012.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Revised Responses to Request for Additional Information No. 891-6268 Revision 3 Questions 17.04-66 and 17.04-67." This RAI response document is being provided on an Optical Storage medium ("OSM")

Enclosed are the revised responses to Questions 17.04-66 and 17.04-67 contained within Reference 1. Responses to the other questions contained within Reference 1 have previously been submitted to the NRC in Reference 2. The responses to Questions 17.04-66 and 17.04-67 are unchanged from those previously submitted in Reference 2; however, the associated Design Certification Document ("DCD") markup pages have been revised to correct a few minor inconsistencies in the previous submittal.

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. Accordingly, the RAI response document is being submitted in two versions on separate OSMs. A non-proprietary version of the RAI response document is also provided (Enclosure 3) with the information identified as proprietary redacted and replaced by the designation "[ ]".

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

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 submittal. His contact information is provided below.

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NRO

Sincerely,

Y. Ogata

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

Enclosures:

1. Affidavit of Yoshiki Ogata

2. OSM 1: Revised Responses to Request for Additional Information No. 891-6268 REVISION 3 Questions 17.04-66 and 17.04-67 (Proprietary version)

3. OSM 2: Revised Responses to Request for Additional Information No. 891-6268 REVISION 3 Questions 17.04-66 and 17.04-67 (Non-proprietary version)

The files contained on OSM 1 and OSM 2 are listed in Attachments 1 and 2 hereto, respectively.

CC: J. A. Ciocco
J. Tapia

Contact Information
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Enclosure 1

Docket No. 52-021
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MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, state as follows:

1. I am Director, 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 document on the enclosed OSM entitled "Revised Responses to Request for Additional Information No. 891-6268 REVISION 3 Questions 17.04-66 and 17.04-67", dated June 11, 2012, 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 design information and analysis of the US-APWR Reliability Assurance Program (RAP), developed by MHI and 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.

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 RAP. Providing public access to such information permits competitors to duplicate or mimic the RAP information without incurring the associated costs.

B. Loss of competitive advantage of the US-APWR created by benefits of enhanced US-APWR RAP information.

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 June, 2012.

Y. Ogata

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

ATTACHMENT 1

Docket No. 52-021
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FILES CONTAINED ON OSM 1

OSM 1: Revised Responses to Request for Additional Information No. 891-6268 REVISION 3 Questions 17.04-66 and 17.04-67 (Proprietary)

Contents of CD

File Name	Size	Sensitivity Level
1.Revised_Response_to_RAI_No_891-6268-P.pdf	235KB	Proprietary

ATTACHMENT 2

Docket No. 52-021
MHI Ref: UAP-HF-12152

FILES CONTAINED ON OSM 2

OSM 2: Revised Responses to Request for Additional Information No. 891-6268 REVISION 3 Questions 17.04-66 and 17.04-67 (Non-Proprietary)

Contents of CD

File Name	Size	Sensitivity Level
1.Revised_Response_to_RAI_No_891-6268-NP.pdf	194KB	Non-Proprietary