MITSUBISHI HEAVY INDUSTRIES, LTD.
16-5, KONAN 2-CHOME, MINATO-KU
TOKYO, JAPAN

June 27, 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-12181

Subject: MHI's Response to US-APWR DCD RAI No. 871-6121 Revision 0 (SRP 19)

Reference: 1) "Request for Additional Information No. 871-6121 Revision 0, SRP Section: 19 – Probabilistic Risk Assessment and Severe Accident Evaluation, Application Section: SRP Chapter 19," dated November 15, 2011.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the document entitled "Response to Request for Additional Information No. 871-6121 Revision 0 (SRP 19)".

Enclosed is the response to 1 RAI question contained within Reference 1.

As indicated in the enclosed materials, this submittal 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 a copy of the proprietary version of the 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).

Enclosure 2 also includes certain information, designated pursuant to the Commission guidance as sensitive unclassified non-safeguards information, referred to as security-related information ("SRI"), that is to be withheld from public disclosure under 10 C.F.R. § 2.390. The information that is SRI is identified by brackets.

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

Sincerely,

Y. Ogata

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

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NRO

Enclosures:

1. Affidavit of Yoshiki Ogata
2. Response to Request for Additional Information No. 871-6121 Revision 0 (SRP 19) (proprietary and contains SRI Information)

CC: J. A. Ciocco
J. Tapia

Contact Information
Joseph Tapia, General Manager of Licensing Department
Mitsubishi Nuclear Energy Systems, Inc.
1001 19th Street North, Suite 710
Arlington, VA 22209
E-mail: joseph_tapia@mnes-us.com
Telephone: (703) 908 – 8055

Enclosure 1

Docket No. 52-021
MHI Ref: UAP-HF-12181

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 enclosed document entitled "Response to Request for Additional Information No. 871-6121, Revision 0 (SRP 19)" dated June 27, 2012, and have determined that the whole document content is proprietary information that should be withheld from public disclosure since this transmittal is a private communication between the Nuclear Regulatory Commission ("NRC") and MHI in accordance with the Request for Additional Information No. 871-6121. 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 and methodology developed by MHI for performing the design of the US-APWR reactor.

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 methodology related to the analysis.

B. Loss of competitive advantage of the US-APWR created by benefits of modeling 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 27th day of June, 2012.

Y. Ogata

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