MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

July 20, 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-12208

Subject: MHI's 2nd Response to the Staff's Requests from the US-APWR Post-LOCA Long-Term Cooling Evaluation Audit

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") an official document entitled "MHI's 2nd Response to the Staff's Requests from the US-APWR Post-LOCA Long-Term Cooling Evaluation Audit". This document provides MHI's 2nd response to the remaining requests which were asked during the audit meeting held on 16 May 2012. At this time, MHI submits the following items:

(1) Discussion of the applicability and scalability of the BACCHUS test to the US-APWR design
(2) Justification of the validity of the initial boric acid concentration used in the creation of DCD Figure 15.6.5-42

As indicated in the enclosed materials, the enclosed 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.

This letter includes a copy of MHI's written response (Enclosure 2) to the verbal request mentioned above, and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the basis of MHI's request 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.

Sincerely,

Hiroki Nishio for

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

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NRO

Enclosures:

1. Affidavit of Yoshiki Ogata

2. MHI's 2nd Response to the Staff's Requests from the US-APWR Post-LOCA Long-Term Cooling Evaluation Audit

CC: J. A. Ciocco
J. Tapia

Contact Information
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ENCLOSURE 1

Docket No.52-021
MHI Ref: UAP-HF-12208

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Nishio Hiroki, state as follows:

1. I am Group Manager-Licensing Promoting Group in 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 "MHI's 2nd Response to the Staff's Requests from the US-APWR Post-LOCA Long-Term Cooling Evaluation Audit" and have determined that portions of the document contain proprietary information that should be withheld from public disclosure. 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 codes and files developed by MHI for the fuel of the US-APWR and also contains information provided to MHI under license from the Japanese Government. These codes and files were developed at significant cost to MHI, since they required the performance of detailed calculations, analyses, and testing extending over several years. 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 and the Japanese Government.

5. 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.

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 fuel 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.

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 Post-LOCA Long-Term Cooling Evaluation Methodology. Providing public access to such information permits competitors to duplicate or mimic the Post-LOCA Long-Term Cooling Evaluation Methodology information without incurring the associated costs.

B. Loss of competitive advantage of the US-APWR created by benefits of enhanced US-APWR Post-LOCA Long-Term Cooling Evaluation Methodology development costs associated with the Emergency Core Coolant 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 20th day of July, 2012.

Hiroki Nishio

Nishio Hiroki
Group Manager-Licensing Promoting Group
APWR Promoting Department
Mitsubishi Heavy Industries, LTD.