MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

August 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-12197

Subject: **MHI's Responses to US-APWR DCD RAI No. 931-6467 REVISION 3 (SRP 03.08.03)**

Reference: 1) "Request for Additional Information No. 931-6467 Revision 3, SRP Section: 03.08.03 - Concrete and Steel Internal Structures of Steel or Concrete Containments," dated May 15, 2012.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") a document entitled "Responses to Request for Additional Information No. 931-6467 Revision 3."

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

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. A non-proprietary version of the document is also being submitted with the information identified as proprietary redacted and replaced by the designation "[ ]".

This letter includes 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 a copy of the proprietary version (Enclosure 2) of MHI's response to Reference 1,.

An English translation of JEAC 4618-2009, which NRC required MHI to provide in the response to Question 03.08.03-89, is attached as Attachment 1 and the original and official JEAC 4618-2009 (Japanese version) is attached as Attachment 2. Since the JEAC 4618-2009 (English version) was translated unofficially, but with permission from The Japan Electric Association, the following reservations apply;

1) If the translated JEAC 4618-2009 is forward to another party, an official copy of JEAC 4618-2009 (Japanese version) must be purchased
2) If there are differences (mistranslation and/or typo) between the Japanese version and the English version of the code, the Japanese version shall be assumed correct

JEAC 4618-2009 (both of versions), in it's entirety, should be treated as proprietary information due to the copyright held by The Japan Electric Association.

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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,

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

Enclosures:

1. Affidavit of Yoshiki Ogata

2. Responses to Request for Additional Information No. 931-6467 REVISION 3 (Proprietary version)

3. Attachment 1: JEAC 4618-2009 Technical Code for A Seismic Design of Steel Plate Reinforced Concrete Structures (English version)
   - Containing Proprietary information

4. Attachment 2: JEAC 4618-2009 Technical Code for A Seismic Design of Steel Plate Reinforced Concrete Structures (Japanese version)
   - Containing Proprietary information

CC: J. A. Ciocco
J. Tapia

Contact Information
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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-12197

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 "Responses to Request for Additional Information No. 931-6467 REVISION 3" dated August 2012, and have determined that portions of the document contain proprietary information that should be withheld from public disclosure. All pages contain proprietary information as 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 documents 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 as it provides the analytical and testing basis for the qualification of steel concrete modules.

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 the development of the unique design parameters.

B. Loss of competitive advantage of the US-APWR created by the benefits of the steel concrete module design.

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 August, 2012.

Y. Ogata

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