MITSUBISHI HEAVY INDUSTRIES, LTD.
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TOKYO, JAPAN

November 29, 2013

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

Attention: Mr. Perry Buckberg

Docket No. 52-021
MHI Ref: UAP-HF-13258

Subject: **Transmittal of Technical Report "MELTAC Platform ISG-04 Conformance Analysis" (MUAP-13018, Revision 0)**

References:
1) "MHI's Responses to US-APWR DCD RAI for Chapter 7 and mark up of Chapter 7 on Revision 3," UAP-HF-11127, dated April 28, 2011, ML11129A174.
2) "MHI's Responses to US-APWR DCD RAI for Chapter 7 and mark up of Tier 1 and Chapter 7 on Revision 3," UAP-HF-11159, dated May 31, 2011, ML11160A098.
3) "MHI's Responses to US-APWR DCD RAI for Chapter 7, Response to the Additional Questions from the NRC, Revision 8 of the Technical Report MUAP-07005-P "Safety System Digital Platform –MELTAC-", and mark up of DCD Tier 1 on Revision 3," UAP-HF-11244, dated August 1, 2011, ML11223A270.
4) "MHI's Responses to US-APWR DCD RAI for Chapter 7, Response to the Additional Questions from the NRC," UAP-HF-11314, dated September 13, 2011, ML11258A153.
5) "MHI's Responses to US-APWR DCD RAI No.995-7024 (SRP 07.01)," UAP-HF-13254, dated November 11, 2013.
6) "MHI's Supplemental Response to US-APWR DCD RAI No. 992-6999 (SRP 07.09)," UAP-HF-13235, dated November 1, 2013.

With this letter, Mitsubishi Heavy Industries, Ltd. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) copies of the technical report entitled "MELTAC Platform ISG-04 Conformance Analysis" (MUAP-13018, Revision 0).

JEXU-1015-1009 Revision 5, "MELTAC Platform ISG-04 Conformance Analysis" is submitted in this document as MHI Technical Report MUAP-13018 Revision 0. This document has been revised to incorporate changes committed to in various RAI responses (References 1 through 6).

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 a copy of the proprietary version of the response (Enclosure 2), a copy of the non-proprietary version of the response (Enclosure 3), and the Affidavit of Tatsuya

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Hashimoto (Enclosure 1) which identifies the reasons MHI respectfully requests that all material designated as proprietary in Enclosure 2 be withheld from disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

Each version of the response is included on a separate compact disc (CD). Attachment 1 is a listing of the files contained in Enclosures 2 and 3. Attachment 2 is a matrix which identifies sections of MUAP-13018, where applicable, which contain information requested by the staff in various Requests for Additional Information (RAIs), and is being provided for the staff's convenience.

Please contact to 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,

for T. Hashimoto

Yoshiki Ogata,
Executive Vice President
Mitsubishi Nuclear Energy Systems, Inc.
On behalf of Mitsubishi Heavy Industries, Ltd.

Enclosures:

1. Affidavit of Tatsuya Hashimoto

2. CD 1:
   MUAP-13018-P Revision 0, "MELTAC Platform ISG-04 Conformance Analysis" (Proprietary)
   - Version containing proprietary information

3. CD 2:
   MUAP-13018-NP Revision 0, "MELTAC Platform ISG-04 Conformance Analysis" (Non-proprietary)
   - Version not containing proprietary information

The file contained on each CD is listed in Attachment 1.

CC: P. Buckberg
J. Tapia

Contact Information
Joseph Tapia, General Manager of Licensing Department
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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-13258

MITSUBISHI HEAVY INDUSTRIES, LTD.
AFFIDAVIT

I, Tatsuya Hashimoto, being duly sworn according to law, depose and state as follows:

1. I am manager, US-APWR Project of Global Nuclear Project Department, of Mitsubishi heavy Industries, LTD. (MHI) and have been delegated the function of reviewing Mitsubishi Heavy Industries, Ltd.'s (MHI) 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 "MELTAC Platform ISG-04 Conformance Analysis" (MUAP-13018, Revision 0), dated November, 2013, and have determined that the document contains 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 information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

3. The basis for holding the referenced information confidential is that it describes the unique design and methodology developed by MHI for performing the I&C design of the US-APWR.

4. The information is 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. Therefore public disclosure of the materials would adversely affect MHI's competitive position.

5. The referenced information has in the past been, and will continue to be, held in confidence by MHI and is always subject to suitable measures to protect it from unauthorized use or disclosure.

6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information.

7. 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.

8. 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 and testing of new systems and components. Disclosure of the information identified as proprietary would therefore 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 safety I&C system. Providing public access to such information permits competitors to duplicate or mimic the safety I&C system design without incurring the associated costs.
B. Loss of competitive advantage of the US-APWR created by benefits of enhanced plant safety, and reduced operation and maintenance costs associated with the safety I&C 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 29th day of November, 2013.

T. Hashimoto

Tatsuya Hashimoto,
Manager-US-APWR Project
of Global Nuclear Project Department
Mitsubishi Heavy Industries, LTD

ATTACHMENT 1

FILES CONTAINED IN CDs

CD 1:

MUAP-13018-P Revision 0, "MELTAC Platform ISG-04 Conformance Analysis" (Proprietary)
- Version containing proprietary information

Contents of CD

File Name	Size	Sensitivity Level
MUAP-13018-P(R0).pdf	1.17MB	Proprietary

CD 2:

MUAP-13018-NP Revision 0, "MELTAC Platform ISG-04 Conformance Analysis" (Non-Proprietary)
- Version not containing proprietary information

Contents of CD

File Name	Size	Sensitivity Level
MUAP-13018-NP(R0).pdf	748KB	Non-proprietary

ATTACHMENT 2

REPORT SECTIONS CONTAINING INFORMATION REQUESTED BY NRC REQUESTS FOR ADDITIONAL INFORMATION (RAIs) (Sheet 1 of 1)

DCD Sect	RAI	eRAI	Question #	Question # (sub-number)	Section, paragraph, figure, and/or table where question is answered
7.9	701	5529	07.09-20	---	Section 3.1.8.
7.1	722	5597	07.01-29	---	Sections 2.2, 3.1.19, 3.1.20, 3.2.1, 3.2.2, 3.3.2, 3.4.3, 3.4.5, and 3.5.2.
7.1	722	5597	07.01-30	---	Entirety of MUAP-13018.
7.9	992	6999	07.09-26	sub-question 2	Section 3.2.1.
7.1	995	7024	07.01-45	---	Sections 0.1, 1.2, 3.1.4, 3.2.1, 3.2.2, 3.3.1, 3.3.6, 3.3.7, and Appendix A.
7	Additional Questions from NRC	---	5-2	---	Section 3.3.6 (Submitted by UAP-HF-11244.)
7	Additional Questions from NRC	---	3-1	---	Sections 3.1.3 and 3.2.3. (Submitted by UAP-HF-11314.)
7	Additional Questions from NRC	---	3-2	---	Section 3.1.10. (Submitted by UAP-HF-11314.)