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

December 18, 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-13311

Subject: Revision 7 of the Technical Report MUAP-10023 "Initial Type Test Result of Class 1E Gas Turbine Generator System"

References:
1) Letter MHI Ref: UAP-HF-13245 from Y. Ogata to U.S. NRC, "Revision 6 of the Technical Report MUAP-10023 'Initial Type Test Result of Class 1E Gas Turbine Generator System' ", dated October 2, 2013 (ML13284A107).
2) Letter MHI Ref: UAP-HF-13034 from Y. Ogata to U.S. NRC, "Updated Closure Plan for US-APWR Seismic and Structural Analyses – Schedule Improvement", dated February 15, 2013 (ML13050A601).

With this letter, Mitsubishi Heavy Industries, LTD. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) Revision 7 of the technical report entitled "Initial Type Test Result of Class 1E Gas Turbine Generator System" which was previously submitted in September 2013 as Revision 6 (Reference 1). The technical report was revised to provide the results of new seismic testing and evaluation as previously committed to in Reference 2. These new results were not included in Revision 6 as discussed with the NRC on a conference call on October 9, 2013.

As indicated in the enclosed materials, this technical report contains information that MHI, Kawasaki Heavy Industries, Ltd. (KHI), and Engine Systems, Inc. (ESI) consider proprietary, and therefore should be withheld from 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 technical report is being submitted in two versions, in separate compact discs. One version (in CDs 1-1, 1-2, and 1-3) contains the complete proprietary version of the technical report. A non-proprietary version of the technical report is enclosed in CD 2. In the non-proprietary version, the proprietary information, bracketed in the proprietary version, is replaced by the designation "[ ]". In accordance with the NRC submittal procedures, this letter includes an Affidavit that identifies the reasons why the proprietary version of the technical report should be withheld from 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 the submittals. His contact information is below.

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NRO

Sincerely,

Y. Ogata

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

Enclosures:

1 - Affidavit of Yoshiki Ogata

2 - CD 1-1: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-P, Rev.7) – Version that contains proprietary information
CD 1-2: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-P, Rev.7) – Version that contains proprietary information
CD 1-3: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-P, Rev.7) – Version that contains proprietary information

3 - CD 2: "Initial Type Test Result of Class 1E Gas Turbine Generator System"
(MUAP-10023-NP, Rev.7) – Version that does not contain proprietary information

The files contained in each CD are listed in Attachments 1, 2, 3 and 4 hereto.

CC: P. Buckberg
J. Tapia

Contact Information
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ENCLOSURE 1

Docket No. 52-021
MHI Ref: UAP-HF-13311

MITSUBISHI HEAVY INDUSTRIES, LTD.
AFFIDAVIT

I, Yoshiki Ogata, state as follows:

1. I am Executive Vice President of Mitsubishi Nuclear Energy Systems, Inc., and have been delegated the function of reviewing Mitsubishi Heavy Industries, Ltd. ("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 "Initial Type Test Result of Class 1E Gas Turbine Generator System" dated December 2013, 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 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, Kawasaki Heavy Industries, Ltd. (KHI), and Engine Systems, Inc. (ESI) 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 of the gas turbine generator system, developed by MHI, KHI, and ESI and not used in the exact form by any of MHI's, KHI's, and ESI's competitors. This information was developed at significant cost to MHI, KHI, and ESI, since it required the performance of Research and Development, 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 supporting 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, KHI, and ESI.

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 technical report 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 class 1E gas turbine generator. Providing public access to such information permits competitors to duplicate or mimic the technology 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 class 1E gas turbine generator.

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 18th day of December, 2013.

Y. Ogata

Yoshiki Ogata,
Executive Vice President
Mitsubishi Nuclear Energy Systems, Inc.

ATTACHMENT 1

FILES CONTAINED IN CD 1-1

CD 1-1: "Initial Type Test Result of Class 1E Gas Turbine Generator System" (MUAP-10023-P, Rev.7) - Version that contains proprietary information

Contents of CD

File Name	Size	Sensitivity Level
001 Initial Type Test Result of Class 1E GTG System-P(R7)_1.pdf	43.0MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_2.pdf	44.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_3.pdf	43.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_4.pdf	44.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_5.pdf	46.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_6.pdf	43.1MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_7.pdf	34.2MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_8.pdf	28.0MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_9.pdf	38.1MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_10.pdf	45.7MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_11.pdf	43.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_12.pdf	40.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_13.pdf	38.0MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_14.pdf	34.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_15.pdf	48.2MB	Proprietary

ATTACHMENT 2

FILES CONTAINED IN CD 1-2

CD 1-2: "Initial Type Test Result of Class 1E Gas Turbine Generator System" (MUAP-10023-P, Rev.7) - Version that contains proprietary information

Contents of CD

File Name	Size	Sensitivity Level
001 Initial Type Test Result of Class 1E GTG System-P(R7)_16.pdf	47.1MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_17.pdf	41.2MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_18.pdf	39.4MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_19.pdf	46.9MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_20.pdf	45.7MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_21.pdf	49.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_22.pdf	48.7MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_23.pdf	42.5MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_24.pdf	38.2MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_25.pdf	39.5MB	Proprietary

ATTACHMENT 3

FILES CONTAINED IN CD 1-3

CD 1-3: "Initial Type Test Result of Class 1E Gas Turbine Generator System" (MUAP-10023-P, Rev.7) - Version that contains proprietary information

Contents of CD

File Name	Size	Sensitivity Level
001 Initial Type Test Result of Class 1E GTG System-P(R7)_26.pdf	42.9MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_27.pdf	34.0MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_28.pdf	44.7MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_29.pdf	35.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_30.pdf	36.6MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_31.pdf	17.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_32.pdf	47.3MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_33.pdf	22.1MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_34.pdf	35.2MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_35.pdf	33.9MB	Proprietary
001 Initial Type Test Result of Class 1E GTG System-P(R7)_36.pdf	46.3MB	Proprietary

ATTACHMENT 4

FILES CONTAINED IN CD 2

CD 2: "Initial Type Test Result of Class 1E Gas Turbine Generator System" (MUAP-10023-NP, Rev.7) - Version that does not contain proprietary information

Contents of CD

File Name	Size	Sensitivity Level
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_1.pdf	35.2MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_2.pdf	39.9MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_3.pdf	34.0MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_4.pdf	44.4MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_5.pdf	46.6MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_6.pdf	43.1MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_7.pdf	34.2MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_8.pdf	14.7MB	Non-Proprietary
001 Initial Type Test Result of Class 1E GTG System-NP(R7)_9.pdf	8.5MB	Non-Proprietary