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

March 27, 2014

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

Attention: Mr. Perry Buckberg

Docket No. 52-021
MHI Ref: UAP-HF-14009

Subject: **MHI's Response to US-APWR DCD RAI No. 1060-7285 (03.07.02)**

Reference: 1) Request for Additional Information No. 1060-7285, Review Section: 03.07.02 – Seismic System Analysis, Application Section: 3.7.2, dated November 15th, 2013, ML13319B188

With this letter, Mitsubishi Heavy Industries, Ltd. (MHI) transmits to the U.S. Nuclear Regulatory Commission (NRC) the document entitled "MHI's Response to US-APWR DCD RAI No. 1060-7285 (03.07.02)."

This letter includes a copy of the proprietary (non-public) version of RAI responses (Enclosure 2), a copy of the non-proprietary (public) version of the RAI responses (Enclosure 3), and the Affidavit of Katsuhisa Takaura (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 CFR § 2.390 (a)(4).

As indicated in the enclosed materials, this document contains information that MHI considers proprietary, and therefore should be withheld from public disclosure pursuant to the 10 CFR § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. The non-proprietary version of the document is also being submitted with the information identified as proprietary redacted and replaced by the designation "[ ]."

The proprietary version of the document 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 CFR § 2.390. The information that is SRI is identified by braces"{ }." The non-proprietary version of the document omits the SRI and is suitable for public disclosure. In the public version of the document, the SRI is replaced by the designation "Security Related Information – Withheld Under 10 CFR 2.390."

Attachment 1 provides a listing of the files contained in Enclosures 2 and 3.

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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 letter. Mr. Tapia's contact information is provided below.

Sincerely,

K. Takaura for

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

Enclosures:

1. Affidavit of Katsuhisa Takaura

2. CD 1: MHI's Response to US-APWR DCD RAI No. 1060-7285 (03.07.02) – Proprietary and SRI included version

3. CD 2: MHI's Response to US-APWR DCD RAI No. 1060-7285 (03.07.02) – Non-Proprietary and SRI excluded version

CC: P. Buckberg
J. Tapia

Contact Information
Joseph Tapia, General Manager of Licensing Department
Mitsubishi Nuclear Energy Systems, Inc.
11405 North Community House Road, Suite 300
Charlotte, NC 28277
E-mail: joseph_tapia@mnes-us.com
Telephone: (704) 945-2740

ATTACHMENT – 1

FILES CONTAINED IN CDs

CD 1: MHI's Response to US-APWR DCD RAI No. 1060-7285 (03.07.02) – Proprietary and SRI included version

Contents of CD1

File Name	Size	Sensitivity Level
1. Include proprietary information		
RAI 1060-7285 Q03.07.02-233(Proprietary).pdf	9.57 MB	Proprietary
RAI 1060-7285 Q03.07.02-235(Proprietary).pdf	3.79 MB	Proprietary
RAI 1060-7285 Q03.07.02-237(Proprietary).pdf	0.76 MB	Proprietary
RAI 1060-7285 Q03.07.02-238(Proprietary).pdf	0.15 MB	Proprietary
RAI 1060-7285 Q03.07.02-241(Proprietary).pdf	0.11 MB	Proprietary
2. Include SRI		
RAI 1060-7285 Q03.07.02-231(Proprietary).pdf	0.75 MB	SRI included
3. Others (No relating proprietary information)		
RAI 1060-7285 Q03.07.02-232.pdf	0.41 MB	None
RAI 1060-7285 Q03.07.02-234.pdf	0.07 MB	None
RAI 1060-7285 Q03.07.02-236.pdf	0.09 MB	None
RAI 1060-7285 Q03.07.02-239.pdf	0.78 MB	None
RAI 1060-7285 Q03.07.02-240.pdf	0.33 MB	None

CD 2: MHI's Response to US-APWR DCD RAI No. 1060-7285 (03.07.02) – Non-proprietary and SRI excluded version

Contents of CD2

File Name	Size	Sensitivity Level
1. Excludes proprietary information		
RAI 1060-7285 Q03.07.02-233(Non-Proprietary).pdf	6.90 MB	Non-proprietary
RAI 1060-7285 Q03.07.02-235(Non-Proprietary).pdf	2.54 MB	Non-proprietary
RAI 1060-7285 Q03.07.02-237(Non-Proprietary).pdf	0.15 MB	Non-proprietary
RAI 1060-7285 Q03.07.02-238(Non-Proprietary).pdf	0.10 MB	Non-proprietary
RAI 1060-7285 Q03.07.02-241(Non-Proprietary).pdf	0.11 MB	Non-proprietary
2. Withheld SRI		
RAI 1060-7285 Q03.07.02-231(Non-Proprietary).pdf	0.16 MB	SRI excluded
3. Others (No relating proprietary information)		
RAI 1060-7285 Q03.07.02-232.pdf	0.41 MB	None
RAI 1060-7285 Q03.07.02-234.pdf	0.07 MB	None
RAI 1060-7285 Q03.07.02-236.pdf	0.09 MB	None
RAI 1060-7285 Q03.07.02-239.pdf	0.78 MB	None
RAI 1060-7285 Q03.07.02-240.pdf	0.33 MB	None

Enclosure1

Docket No. 52-021
MHI Ref: UAP-HF-14009

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Katsuhisa Takaura, state as follows:

1. I am Manager, APWR Project of Global Nuclear Project 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 Response to US-APWR DCD RAI No. 1060-7285(03.07.02)" dated March 2014, 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 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 CFR § 2.390 (a)(4).

3. The information identified as proprietary in the enclosed document as 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 information and analysis, developed by MHI and 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.

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 the methodology of modeling and analysis for building structure design. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.

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 March, 2014.

K. Takaura

Katsuhisa Takaura,
Manager- APWR Project
Of Global Nuclear Project Department
Mitsubishi Heavy Industries, Ltd.