

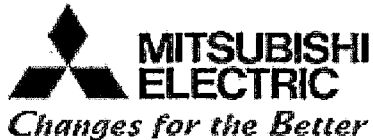
The documents listed below are submitted as proprietary information in support of **NRC Project No. 0812.**

No.	Document Number	Document Title
001	JEXU-1041-8553	Submittal Letter (2 Pages)
002	Enclosure 1	Affidavit (2 Pages)
003	JEXU-1041-1140-P	Conformance of MELTAC Platform Development to RG1.152 Rev. 3 (29 Pages)

The NRC Contact for this submittal is Joseph Holonich, (301) 415-7297 Joseph.Holonich@nrc.gov.

This submittal is provided by Mitsubishi Electric Power Products, Inc. (MEPPI) in support of NRR's safety evaluation of the Mitsubishi Electric Company's digital I&C controller platform, MELTAC.

The MEPPI contact for this submittal is Ken Krayvo.



Ken Krayvo
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NRR



February 6, 2018
JEXU-1041-8553

Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

PROJ 0812

Attention: Mr. Joseph Holonich

SUBJECT: Submittal of MELTAC Platform SDOE Vulnerability Assessment Supporting Documentation

With this letter, Mitsubishi Electric Corporation (MELCO) submits the documents listed in the enclosures table below to the U.S. Nuclear Regulatory Commission (NRC).

MELTAC Topical Report Supporting Documentation is enclosed. As indicated in the enclosed materials, these documents contain information that MELCO 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.

The accompanying affidavit, Enclosure (1) sets forth the basis on which the information identified as proprietary should be withheld from public disclosure.

As noted in IN 2009-07, in instances in which a nonproprietary version would be of no value to public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted. As identified in the following table, only proprietary version of the document is being submitted.

Sincerely,

Manabu Taniguchi
Senior Manager, Control & Protection Systems Section
Nuclear Power Department, Energy Systems Center
Mitsubishi Electric Corporation

Enclosures:

No.	Document Number	Document Title	Date of Issue
1	-	Affidavit of Manabu Taniguchi	02/06/2018
2	JEXU-1041-2073-P	Conformance of MELTAC Platform Development to RG1.152 Rev.3	01/16/2018

CC: Gilbert W. Remley
Nuclear Systems Department Manager
Mitsubishi Electric Power Products, Inc

ENCLOSURE 1

MITSUBISHI ELECTRIC CORPORATION

AFFIDAVIT

I, Manabu Taniguchi, state as follows:

1. I am the Senior Manager of the Control & Protection Systems Section, Nuclear Power Department, of Mitsubishi Electric Corporation ("MELCO"), and have been delegated the function of reviewing MELCO's digital platform 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 Responses to request for additional information (refer to Table 1), 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 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 MELCO 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 hardware and software information for the digital platform "MELTAC", developed by MELCO and not used in the exact form by any of MELCO's competitors. This information was developed at significant cost to MELCO, since it required research 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, MELCO knows of no way the information could be lawfully acquired by organizations or individuals outside of MELCO.

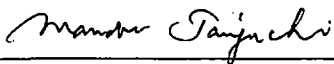
7. Public disclosure of the referenced information would assist competitors of MELCO in their design of nuclear power plants without incurring the costs or risks associated with the design and testing of the subject systems. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MELCO in the nuclear plant market:
- A. Loss of competitive advantage due to the costs associated with development and testing for MELTAC. Providing public access to such information permits competitors to duplicate or mimic MELTAC design without incurring the associated costs.
 - B. Loss of competitive advantage created by benefits of enhanced plant safety, and reduced operation and maintenance costs associated with MELTAC, for nuclear power plants.

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.

Table 1 Responses to request for additional information and updated topical report supporting documentation

No.	Question No.	Document Number	Rev.
1	Conformance of MELTAC Platform Development to RG1.152 Rev.3	JEXU-1041-1140	A

Executed on this 5th day of February, 2018.



Manabu Taniguchi
Senior Manager, Control & Protection Systems Section
Nuclear Power Department, Energy Systems Center
Mitsubishi Electric Corporation