

**Withhold from Public Disclosure Under 10 CFR 2.390**

**When Separated from the Proprietary Enclosure  
(Enclosure 2), this document is Decontrolled**

September 11, 2009

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: **Docket No. 50-362  
Root Cause Evaluation  
Divider Plate Weld Joint Separation in the  
Replacement Steam Generators  
San Onofre Nuclear Generating Station, Unit 3**

Dear Sir or Madam:

This letter provides the Root Cause Evaluation for the replacement steam generator divider plate weld joint separation for San Onofre Nuclear Generating Station, Unit 3.

The Root Cause Evaluation was prepared by Mitsubishi Heavy Industries, Ltd (MHI), and the report contains information that is proprietary to MHI. Southern California Edison (SCE) requests that the proprietary version of the Root Cause Evaluation, provided as Enclosure 2 to this letter, be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4).

Enclosure 1 of this letter provides an MHI affidavit, which sets forth the basis on which the information in Enclosure 2 may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed by paragraph (b)(4) of 10 CFR 2.390.

Enclosure 2 provides the proprietary version of the Root Cause Evaluation.

Enclosure 3 provides a non-proprietary version of the Root Cause Evaluation.

There are no new commitments or required actions resulting from this letter.

*Acc  
NRR*

If you have any questions regarding this information, please feel free to contact Ms. Linda T. Conklin at (949) 368-9443.

Sincerely,

A handwritten signature in black ink, appearing to read "G. G. Warnick". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Enclosures

cc: E. E. Collins, Regional Administrator, NRC Region IV  
R. Hall, NRC Project Manager, San Onofre Units 2 and 3

No Enclosures

G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

Enclosure 1

Affidavit

For Withholding from Public Disclosure

(5 pages)

**MITSUBISHI HEAVY INDUSTRIES, LTD.**

**AFFIDAVIT**

I, Hitoshi Kaguchi, state as follows:

1. I am Manager, Nuclear Plant Component Designing Department, of Mitsubishi Heavy Industries, Ltd. ("MHI"), and have been delegated the function of reviewing the referenced MHI technical 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 that is privileged or confidential. I am authorized to apply for the withholding of such information from public disclosure.
2. In accordance with my responsibilities, I have reviewed the enclosed document entitled "San Onofre Nuclear Generating Station, Units 2 & 3 Replacement Steam Generators, Divider Plate Weld Joint Separation Root Cause Evaluation Report", 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 "[ ]" and marked with the basis for withholding (a and/or b, as described in paragraph 7 below). 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 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 unique design, manufacturing, experimental and investigative information 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 is the result of an intensive MHI effort.



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 and manufacture of nuclear plant components without incurring the costs or risks associated with the design and the manufacture of the subject component. 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. and world nuclear markets:
  - A. Loss of competitive advantage due to the costs associated with development of welding technology, special examination processes, and experimental programs relating to the component design and manufacture. Providing public access to such information permits competitors to duplicate or mimic the methodology without incurring the associated costs.
  - B. Loss of competitive advantage of MHI's ability to supply replacement or new heavy components such as steam generators.



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 10 day of September, 2009.

H Kaguchi

Hitoshi Kaguchi,  
General Manager- Nuclear Plant Component Designing Department  
Mitsubishi Heavy Industries, LTD

Sworn to and subscribed

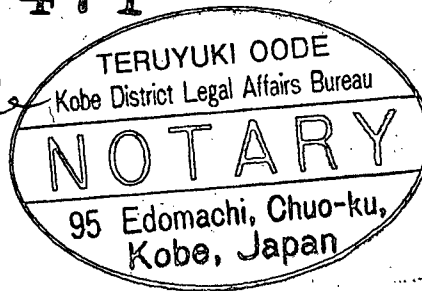
Before me this 10 day

SEP. 10.2009

of September, 2009

471

Teruyuki Oode  
Notary Public



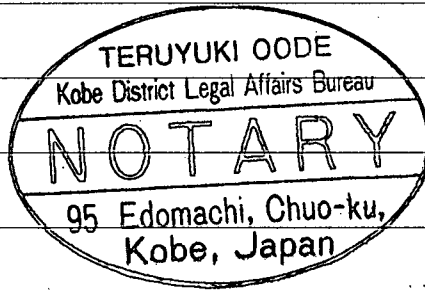
My Commission Expires \_\_\_\_\_



登簿平成21年第471号

認 証

囑託人 三菱重工業株式会社 神戸造船所 原子  
力機器設計部 部長 加 口 仁 は本職の面前  
で添付書面に 署名 した。



よって認証する。

平成21年9月10日

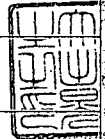
本職役場に於て

神戸市中央区江戸町95番地

神戸地方法務局所属

公証人

大 乙 光 之



公 証 人 役 場

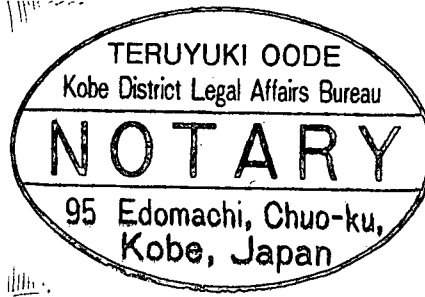


Registered Number 4 7 1

Date SEP.10.2009

## NOTARIAL CERTIFICATE

This is to certify that HITOSHI KAGUCHI , General Manager – Nuclear Plant Component Designing Department of MITSUBISHI HEAVY INDUSTRIES,LTD. has affixed his signature in my very presence to the attached document.



TERUYUKI OODE

Notary

95 Edomachi, Chuo-Ku,

Kobe, Japan

Kobe District Legal Affairs Bureau

(面前法2)