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

February 14, 2012

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

Attention: Mr. Jeffrey A. Ciocco

Docket No. 52-021
MHI Ref: UAP-HF-12042

Subject: Transmittal of Technical Report for the US-APWR Verification and Validation Implementation Plan

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the documents related to the US-APWR HFE Implementation Plan. The documents are being submitted electronically in compact discs ("CDs"), and the CDs include two (2) documents.

- MUAP-10012-P Rev.1
  US-APWR Verification and Validation Implementation Plan
  – Version containing Proprietary information

- MUAP-10012-NP Rev.1
  US-APWR Verification and Validation Implementation Plan
  – Version not containing Proprietary information

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.

Sincerely,

Y. Ogata

Yoshiki Ogata,
Director- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

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NRO

Enclosure:

1. Affidavit of Yoshiki Ogata

2. CD1: US-APWR Verification and Validation Implementation Plan, MUAP-10012-P Rev.1 (includes 1 document in the CD1)
   – Version containing Proprietary information

3. CD2: US-APWR Verification and Validation Implementation Plan, MUAP-10012-NP Rev.1 (includes 1 document in the CD2)
   – Version not containing Proprietary information

The files contained in the CDs are listed in Attachment 1 and 2 hereto.

CC: J. A. Ciocco
J. Tapia

Contact Information
Joseph Tapia, General Manager of Licensing Department
Mitsubishi Nuclear Energy Systems, Inc.
1001 19th Street North, Suite 710
Arlington, VA 22209
E-mail: joseph_tapia@mnes-us.com
Telephone: (703) 908 – 8055

Docket No. 52-021

ENCLOSURE 1

MITSUBISHI HEAVY INDUSTRIES, LTD.

AFFIDAVIT

I, Yoshiki Ogata, state as follows:

1. I am Director, APWR Promoting 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 "US-APWR Verification and Validation Implementation Plan " dated February 2012, 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 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 implementation plan of Human Factor Engineering, 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 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 MHI in the U.S. nuclear plant market:

A. Loss of competitive advantage due to the costs associated with development of the US-APWR Human Factor Engineering. Providing public access to such information permits competitors to duplicate or mimic the Human Factor Engineering information without incurring the associated costs.

B. Loss of competitive advantage of the US-APWR created by benefits of enhanced US-APWR Human Factor Engineering development costs associated with the Human System Interface 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 14th day of February, 2012.

Yoshiki Ogata,
Director- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

ATTACHMENT 1

FILES CONTAINED IN CD 1

CD 1: "US-APWR Verification and Validation Implementation Plan, MUAP-10012-P Rev.1"

Contents of CD

File Name	Size	Sensitivity Level
MUAP-10012-P(R1) US-APWR Verification and Validation Implementation Plan.pdf	0.6MB	Proprietary

ATTACHMENT 2

FILES CONTAINED IN CD 2

CD 2: "US-APWR Verification and Validation Implementation Plan, MUAP-10012-NP Rev.1"

Contents of CD

File Name	Size	Sensitivity Level
MUAP-10012-NP(R1) US-APWR Verification and Validation Implementation Plan.pdf	0.4MB	Non-Proprietary