COLA Revision and Decision Governance
Nuclear Development Organization
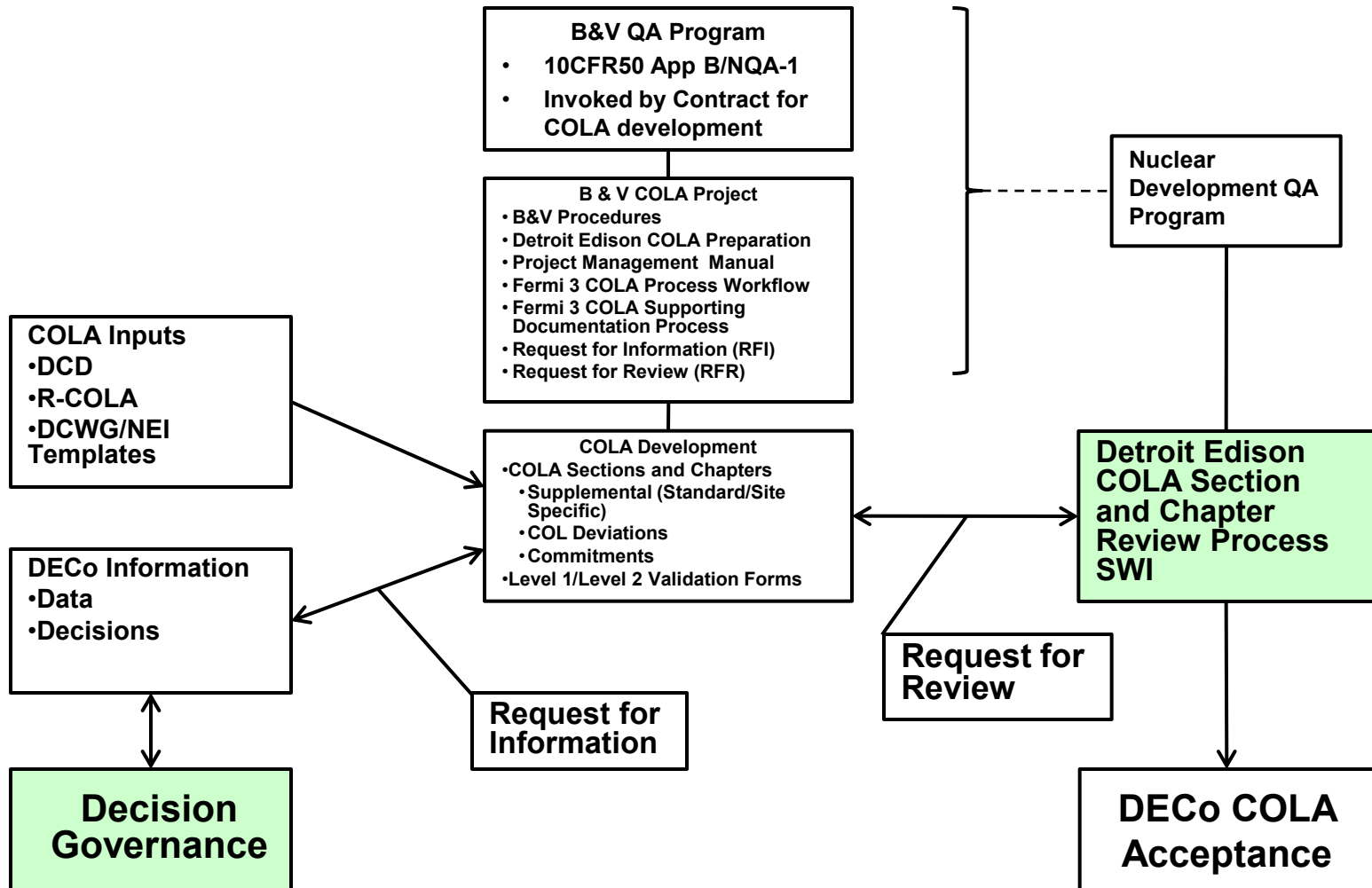
October, 2008

Objectives

Obtain Input and Approval for Post COLA Processes

- **Discuss COLA Revision Process**

- **Review Detroit Edison interfaces with COLA Revision and Task Model**

- **Decision Governance Process Changes going forward to support COLA Revision**

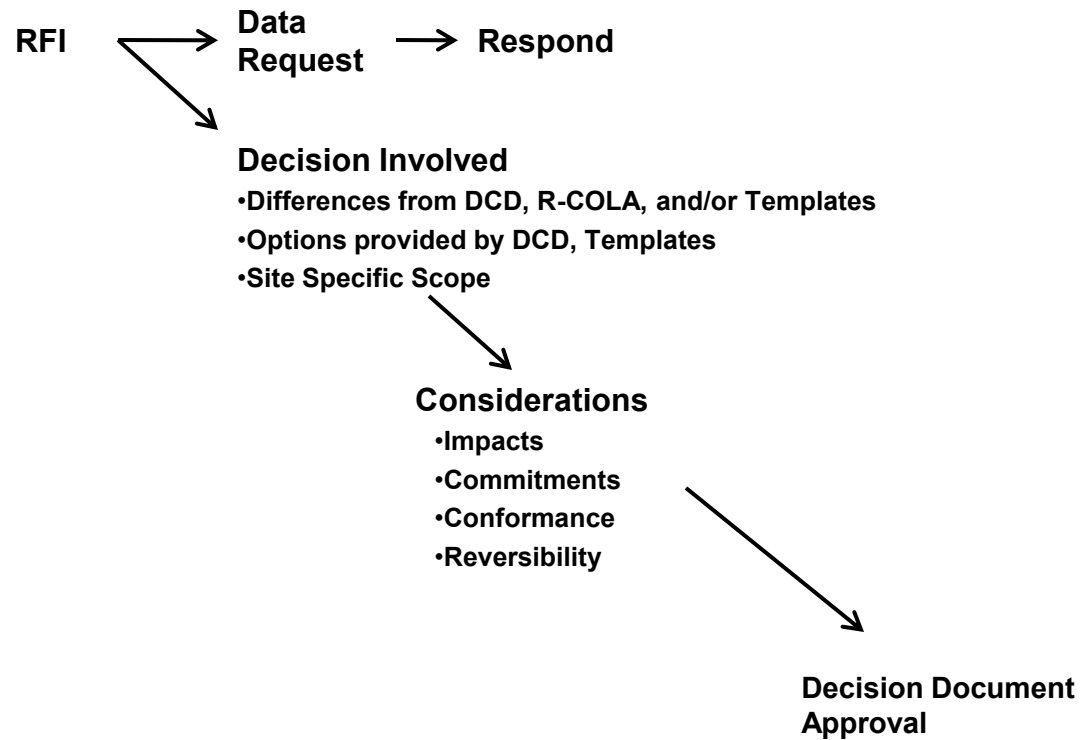- **CNO Touch Points and Revision Approval**

RFI Process and Status

- **The Black & Veatch COLA project implements a formal Request For Information (RFI) process to satisfy QA program requirements for development of the Fermi 3 COLA.**

- **The RFI process provides a trackable mechanism by which the COLA team can request and DECo can reply with information required for COLA preparation.**

- **The OE is responsible for collecting and coordinating answers to RFI's, which are sent to the COLA team after signoff by the DECo Nuclear Development group.**

- **As of January 31, 2008, 110 RFI had been submitted by the B&V COLA team of which 68 have been closed.**

  - Simple data/information RFI's: 60 Closed, 35 open
  - Decision related RFI's: 8 closed, 7 open

- **As we progress further through the COLA preparation process, RFI's have begun to include requests that require a decision rather than simple information gathering**

- **This suggests the need for a Decision Governance process that will insure that COLA related decisions are adequately discussed and resolved at appropriate levels in the organization.**

Proposed Decision Governance

RFI → Data Request → Respond

Decision Involved
- Differences from DCD, R-COLA, and/or Templates
- Options provided by DCD, Templates
- Site Specific Scope

Considerations
- Impacts
- Commitments
- Conformance
- Reversibility

Decision Document Approval

Proposed Decision Governance

Guiding Principles
- Differences from DCD and Generic Industry Positions/ Templates will only be considered if there are site specific reasons
- Differences from the R-COLA will only be considered if there are:
  - Site specific reasons
  - The R-COLA deviates from the DCD or Generic Industry Positions/Templates
  - Options are provided by the DCD or Generic Industry positions that are equally acceptable
- Documented in a Decision Document

Decision Governance Considerations
- Affects Previous Site Arrangement/Utilization Decisions
- Affects Common EF2/EF3 Structures/Facilities
- Affects EF2 Processes/Programs/Systems
- Affects capital deployment costs
- Involves non- standard commitments
- Does not conform with current regulatory positions
- Involves an irreversible decision

Decision Governance
- Decisions involving any of these considerations are considered significant and would require prior approval of MEP-SVP and CNO, or higher.
- Decisions not involving any of the above considerations may be made by Director and Project Manager, Nuclear Development
- All decisions to be documented in Decision Documents and distributed to MEP-SVP and CNO

COLA Review Process

Purpose
- Assure that the COLA will satisfy the NRC acceptance review and minimize post docketing RAIs
- Acceptance of the COLA work product
- Support complete and accurate affirmation for submittal

DECo Review is not intended to be a validation
- COLA prepared under B&V's Appendix B QA program
- Conformance with that program provides validation bases
- Audits and surveillances of program conformance
- Includes review of B&V Development Basis Matrices and Validation Documents

Standard Work Instruction and Comprehensive Checklists Developed to Support Review
- Reviewed other COLA project instructions, NRC and NuStart guidance documents and procedures
- Compensate for relatively inexperienced staff performing review
- Focuses on preparation; understanding of regulatory standards; and checklist driven reviews
- Surveillance and audits of B&V KC activities related to COLA section and chapter preparation.

Deliverables from review include
- Completed Checklists with all comments resolved
- Identification of Deviations
- Identification of Commitments
- Identification of SUNSI and other information to be withheld from public disclosure

COLA Review Process Overview
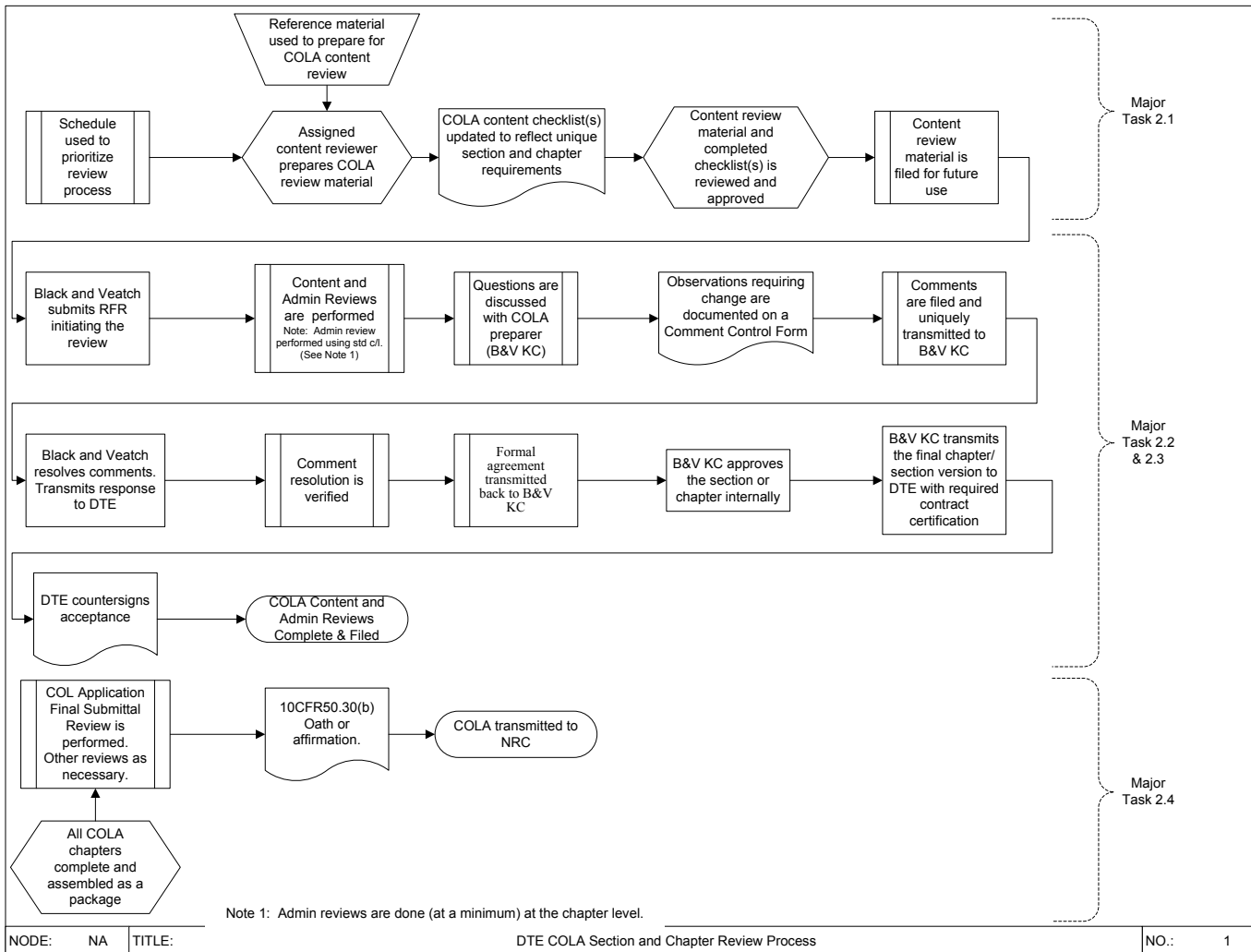
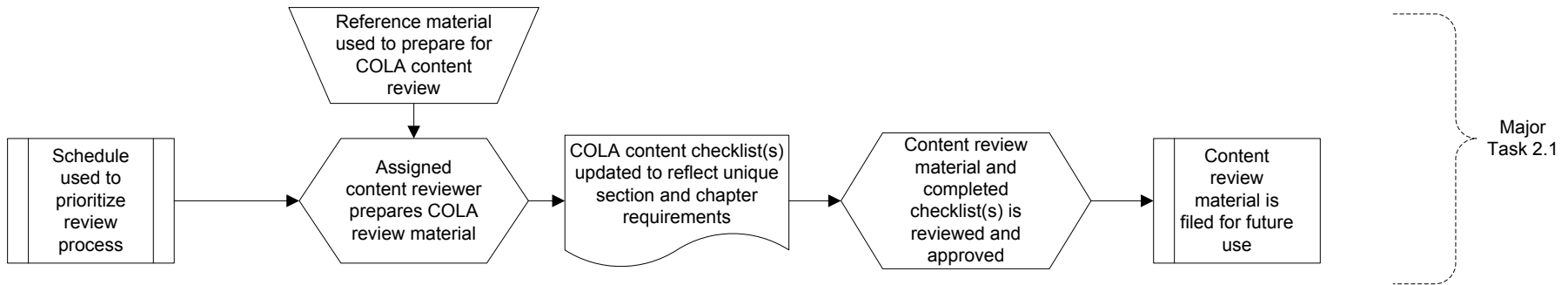**Major Steps**

2.1 Prepare for Review

2.2 Perform Section and Chapter Content Review

2.3 Perform Section and Chapter Administrative Review

2.4 Assemble, check, approve, and submit COL Application to NRC

2.5 Proactive assessments

2.1 Prepare for Review

- **Preparers and reviewers are the same**

  – Good preparation should result in familiarity with the COLA content and a better quality more timely review
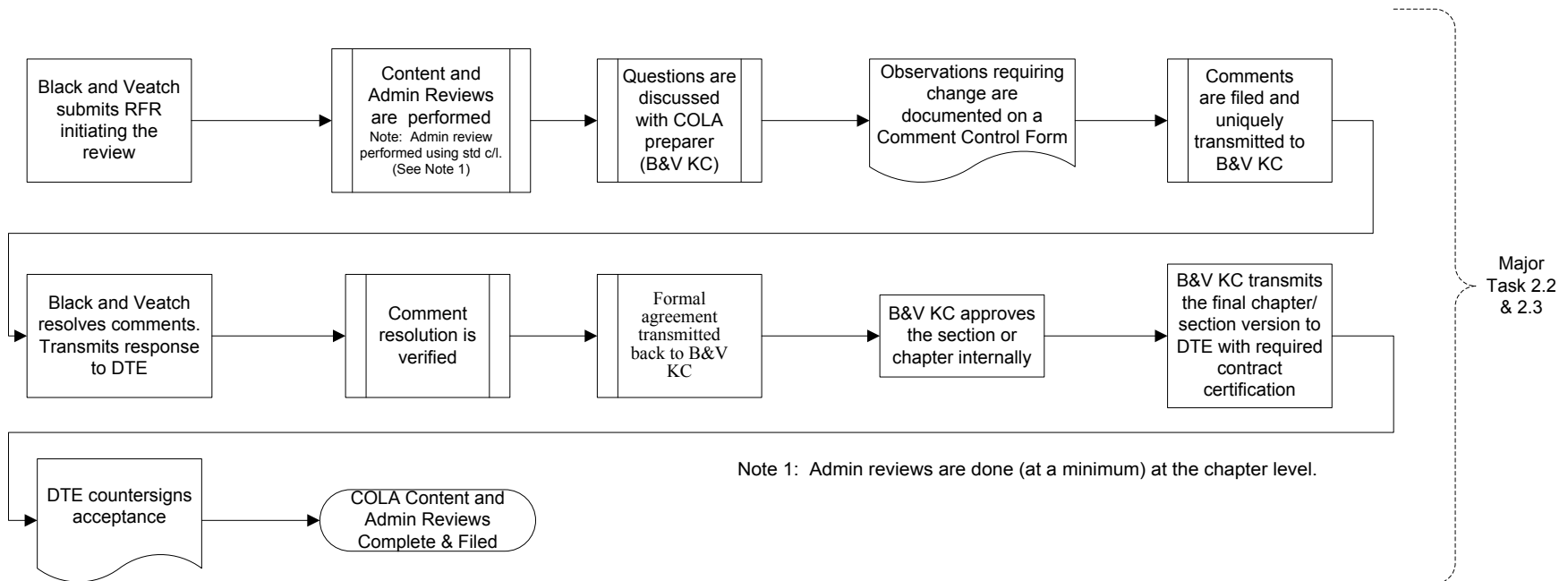
- **Standard COLA checklist ensures NRC criteria for completeness of COL application is satisfied**

- **COLA checklist is expanded for each COLA section and chapter**

 – DBM requirements satisfied for site specific content

  – Other attributes that the reviewer and supervisor agree should be reviewed

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Black and Veatch          Content and            Questions are         Observations requiring      Comments
submits RFR              Admin Reviews           discussed             change are                are filed and
initiating the           are performed    ──►    with COLA     ──►     documented on a     ──►    uniquely
review                   Note: Admin review             preparer             Comment Control Form       transmitted to
                         performed using std c/l.     (B&V KC)                                          B&V KC
                         (See Note 1)


Black and Veatch         Comment                 Formal                B&V KC approves            B&V KC transmits
resolves comments.       resolution is           agreement             the section or            the final chapter/
Transmits response ──►   verified         ──►    transmitted   ──►     chapter internally  ──►    section version to
to DTE                                           back to B&V                                      DTE with required
                                                 KC                                               contract
                                                                                                  certification
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Major Task 2.2 & 2.3

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DTE countersigns         COLA Content and
acceptance        ──►    Admin Reviews
                         Complete & Filed
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Note 1: Admin reviews are done (at a minimum) at the chapter level.

- **Reviewers prepared the checklist and documentation required for the COLA**

- **Administrative review is standard for each section and chapter**

- **Existing Black & Veatch "RFR" process leveraged**

2.4 Assemble, check, approve, and submit COL Application to NRC
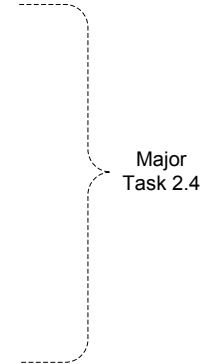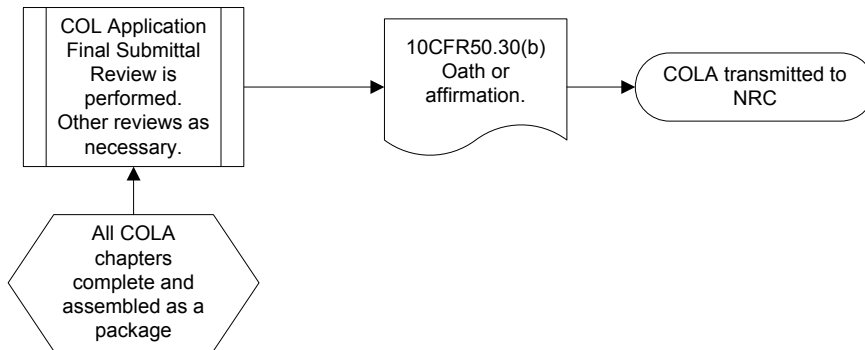
- **Final COL Application is checked using Section and Chapter Final Submittal Review Checklist**
  - Included a final check that all internal reviews have been completed and comments resolved or appropriately annotated in the submittal
  - Verify complete application is administratively correct
  - Will includes page turn and electronic filing pre-flight

- **Oath and affirmation and submittal follow final administrative review.**

Conclusion

- **Consensus on Decision Governance process**

- **Consensus on COLA Review process**