United States Nuclear Regulatory Commission Official Hearing Exhibit			
In the Matter of:	DETROIT EDISON COMPANY (Fermi Nuclear Power Plant, Unit 3)		
	ASLBP #:	09-880-05-COL-BD01	
	Docket #:	05200033	
	Exhibit #:	NRCS020-00-BD01	**Identified:** 10/30/2013
	Admitted:	10/30/2013	**Withdrawn:**
	Rejected:		**Stricken:**
	Other:		

EXHIBIT NRC S20

Detroit Edison Company Response to NRC Request for Additional Information Letter No. 37, Attachments 4-5 (August 13, 2010)

Exhibit NRC S20

The Detroit Edison Company
One Energy Plaza, Detroit, MI 48226-1279

DTE Energy
Detroit Edison

10 CFR 52.79

August 13, 2010
NRC3-10-0034

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

References: 1) Fermi 3
Docket No. 52-033
2) Letter from Jerry Hale (NRC) to Jack M. Davis (Detroit Edison), "Request for Additional Information Letter No. 37 Related to the SRP Sections 2.5.1, 13.3 and 17.5 for the Fermi 3 Combined License Application," Dated June 30, 2010

Subject: Detroit Edison Company Response to NRC Requests for Additional Information Letter No. 37

In Reference 2, the NRC requested additional information to support the review of certain portions of the Fermi 3 Combined License Application (COLA). The responses to the Request for Additional Information (RAI) associated with Reference 2, SRP Sections 2.5.1, 13.3, and 17.5 are provided as Attachment 1 through 7 of this letter. Information contained in these responses will be incorporated into a future COLA submission as described in the attachments.

If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of August 2010.

Sincerely,

Peter W. Smith, Director
Nuclear Development – Licensing & Engineering
Detroit Edison Company

D095
NRO

Attachments:
1) Response to RAI Letter No. 37, RAI Question No. 13.03-52
2) Response to RAI Letter No. 37, RAI Question No. 13.03-53
3) Response to RAI Letter No. 37, RAI Question No. 17.5-20
4) Response to RAI Letter No. 37, RAI Question No. 17.5-21
5) Response to RAI Letter No. 37, RAI Question No. 17.5-22
6) Response to RAI Letter No. 37, RAI Question No. 02.05.01-31
7) Response to RAI Letter No. 37, RAI Question No. 02.05.01-32

cc: Jerry Hale, NRC Fermi 3 Project Manager
Adrian Muniz, NRC Fermi 3 Project Manager
Bruce Olson, NRC Fermi 3 Environmental Project Manager
Fermi 2 Resident Inspector (w/o attachments)
NRC Region III Regional Administrator (w/o attachments)
NRC Region II Regional Administrator (w/o attachments)
Supervisor, Electric Operators, Michigan Public Service Commission (w/o attachments)
Michigan Department of Environmental Quality, Radiological Protection and Medical Waste Section (w/o attachments)

Attachment 4
NRC3-10-0034

Response to RAI Letter No. 37
(eRAI Tracking No. 4812)

RAI Question No. 17.5-21

NRC RAI 17.5-21

SRP Section 17.5 part II, subsection A, "Organization," states that the applicant's QAPD should 1) contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces, 2) include the onsite and offsite organizational elements that function under the cognizance of the QA program, 3) define the interface responsibilities for multiple organizations.

The NRC endorsed the Nuclear Energy Institute (NEI) QAPD template (NEI 06-14, Revision 7, "Quality Assurance Program Description") as a method for providing a QAPD that meets the requirements of 10 CFR Part 50, Appendix B.

Attachment 6 to NRC3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No.10," dated September 30, 2009, states FSAR Appendix 17AA, Part II, Section 1, Fermi 3 QAPD "Organization" will be revised to reflect NEI 06-14, Revision 7.

NEI Template 06-14, Revision 7, Part II, section 1 "Organization", The fourth note states "Structure Section 1, "Organization" of the QAPD such that it clearly delineates how the QA program is implemented during all applicable phases such as the period of construction and testing and the operations phase. The transition process from one phase to another must be described. Position descriptions should clearly delineate these roles during each applicable phase such as the construction/pre-operational phase, the operations phase, as well as the transition period between the phases."

Proposed changes to the Fermi 3 QAPD (FSAR Appendix 17AA) Part II, Section 1, provided as part of Attachment 8 to NRC3-10-0016, "Detroit Edison Company Response to NRC Request for Additional Information Letter No.25," dated April 26, 2010, contains general information addressing the organizational change process between phases.

Staff review identified that the QAPD does not appear to meet the organizational guidance of the NEI QAPD template for all described phase transitions. Specifically, Section 1 does not provide enough detailed information to address the fourth note of the NEI template 06-14, Revision 7, Part II, Section 1, "Organization."

Please provide the following additional details within Part II, Section 1, of the QAPD to address the fourth note of NEI 06-14, Revision 7, Part II, section 1, or provide justification for any exceptions to the guidance provided in NEI 06-14, Revision 7:

(a) Please identify each applicable project phase described within the QAPD, Part II, section 1 "Organization".

(b) Please describe the organizational transition process between each of the applicable project phases. Response should address implementation and control of major transitions such as staff positions, staff locations, project management, and

continuity of on-going quality programs (e.g. corrective actions, quality assessments, etc.).

Note: This RAI is supplemental to RAI 17.5-10 included in NRC RAI Letter No. 25, dated March 2, 2010.

Response

a. *Please identify each applicable project phase described within the QAPD, Part II, section 1 "Organization".*

The Fermi 3 QAPD organizational structure encompasses three project phases as described in Section 1. The Pre-COL phase is described within QAPD Section 1.1 and Figure II.1-1, the Design and Construction phase is described within QAPD Section 1.2 and Figure II.1-2, and the Operations phase is discussed in Section 1.3 and Figure II.1-3. The descriptions of Sections 1.1, 1.2, and 1.3 will be revised as shown in the attached markups to more clearly identify each project phase to which the organizational description of these sections applies.

b. *Please describe the organizational transition process between each of the applicable project phases. Response should address implementation and control of major transitions such as staff positions, staff locations, project management, and*

Project phase transition responsibilities and transitional activities between project phases are currently described in Pre-COL Organization sections 1.1.2.1 "Senior Vice President, MEP", 1.1.2.2 "Nuclear Development", as well as Design and Construction Organization sections 1.2 "Fermi 3 Design and Construction Organization", 1.2.2.1 "Senior Vice President, MEP", 1.2.2.2 "Nuclear Development", 1.2.3.2.1.1 "Fermi 3 Quality Assurance Project Manager".

QAPD Section 1, "Organization" will be revised to include further transition process details in two new sections, 1.1.8 and 1.2.9 as shown in the attached markups. Transitional activities associated with specific position responsibilities will be included within the transition descriptions.

Proposed COLA Revision

QAPD Sections 1.1, 1.2, and 1.3 will be revised as shown on the attached markups to include descriptions of each applicable QAPD phase as discussed above. Sections 1.1.8 and 1.2.9 will be inserted to describe transitional activities between phases.

Markup of Detroit Edison COLA
(following 6 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in a future submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

PART II QAPD DETAILS

SECTION 1 ORGANIZATION

are satisfied and that Detroit Edison's responsibility to ensure

This section describes the Fermi 3 organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes corporate support and on-site functions for Fermi 3 including interface responsibilities for multiple organizations that perform quality-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of the QAPD. Management gives careful consideration to the timing, extent, and effects of organizational structure changes. (MEP)

Major Enterprise Projects, specifically the Nuclear Development (ND) organization is responsible for new nuclear plant licensing, engineering, procurement, construction, startup and operations development activities. During these phases, several organizations within Detroit Edison implement and support the QAPD. These organizations include, but are not limited to ~~Major Enterprise Projects (~~MEP~~)~~, MEP Program Office, and Corporate Services.

Design, engineering and environmental services may be provided to the Fermi 3 ~~Nuclear Development~~ organization by suppliers in accordance with their 10 CFR 50 Appendix B/NQA-1 QAPDs, as established contractually to assure that applicable regulatory requirements ~~to assure~~ adequate quality assurance under 10 CFR 50 Appendix B, Criterion I is satisfied.

The Fermi 3 Site organization is responsible for operational activities. During operations, the corporate services organization within Detroit Edison also implements and supports the QAPD.

~~Design, engineering and environmental services may be provided to the Fermi 3 Operations organization by suppliers in accordance with their 10 CFR 50 Appendix B/NQA-1 QAPDs, as established contractually to assure that applicable regulatory requirements to assure adequate quality.~~

The following sections describe the reporting relationships, functional responsibilities and authorities for organizations implementing and supporting the Fermi 3 ~~Nuclear Development~~ QA Program. The Fermi 3 Pre-COL ~~Nuclear Development~~ organization, the Fermi 3 Design and Construction organization, and the Fermi 3 Site organization are shown in QAPD Figure II.1-1, Figure II.1-2, and Figure II.1-3 respectively.

1.1 Fermi 3 Pre-COL Organization

This section describes the organizational structure for the COL application activities of Fermi 3 and the Fermi 3 Pre-COL organizational structure is shown in Figure II.1-1.

Insert 1A

Markups to Revision 2

For COL application activities, independence shall be maintained between the organization or organizations performing the checking (quality assurance and control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

1.1.7 NQA-1-1994 Commitment

In establishing its organizational structure, Detroit Edison, Fermi 3 commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.

Insert 2A

1.2 Fermi 3 Design and Construction Organization

This section describes the organizational structure through the design and construction phase of the Fermi 3 project. It is anticipated that even after fuel load, construction activities will be ongoing. Those positions required to support these activities will retain their applicable construction / preoperational responsibilities until it is deemed that they are no longer necessary. As the construction of systems, structures, and components (SSC), or portions thereof is completed, control and authority (including oversight, configuration and operations) is transferred from the contractor to the cognizant owner departments in the operations phase fully described in Section 1.3. During the transition, responsibilities will be clearly defined in instructions and procedures to ensure appropriate control is maintained over each SSC. The Fermi 3 Design and Construction organization is represented in Figure II.1-2.

Insert 1B

1.2.1 Chairman and CEO

The ~~DTE Energy~~ Chairman/CEO is responsible for all aspects of design, construction and operation of Detroit Edison's nuclear plants as described in Section 1.1.1

s

1.2.2 Major Enterprise Projects ~~– Nuclear Development~~

The Major Enterprises Project (MEP) organization, specifically Nuclear Development is responsible for new nuclear plant licensing, engineering, procurement, construction, startup and operational development activities necessary to deliver new nuclear generating capacity to the ~~Sr. Vice President~~/CNO. ~~Nuclear Development will facilitate organizational transitions between the Fermi 3 Pre-COL, Design and Construction, and Operations phases. Nuclear Development is responsible for controlling interfaces between the operating units and any preconstruction or construction activities.~~

1.2.2.1 Senior Vice President, MEP

The Sr. VP MEP ultimately reports to the ~~DTE Energy~~ Chairman / CEO and is responsible for the administration of the Fermi 3 QAPD. The Sr. VP MEP also directs the planning and development of the Nuclear Development staff and organization resources as well as the initial Fermi 3 staff and organization resources. The Sr. VP MEP is responsible to size the Fermi 3 Quality Assurance organization commensurate with the duties and responsibilities assigned

The reactor technology vendor, indentified in FSAR Subsection 1.4.2,

systems, structures and components (SSC), or portions thereof to support transfer from the construction contractor to the cognizant owner departments as described in FSAR Appendix 13AA, Section 13AA.2.2.

Insert 9 (2 pgs)

1.2.5.2 ~~NSSS~~ Reactor Technology Vendor

~~NSSS~~ provides engineering services for plant design and licensing of Fermi 3 on the Detroit Edison site. These engineering services for Fermi 3 include site-specific engineering and design necessary to support preconstruction and construction activities associated with the nuclear steam supply system (NSSS), i.e. the certified portion of the design.

The

the remaining plant design and licensing of Fermi 3 on the Detroit Edison Site.

1.2.5.3 ~~A/E~~ Architect/Engineer (A/E)

A/E Firm provides engineering services for ~~the development of the COL application~~. These engineering services include ~~site-specific license engineering, and design activities necessary to support development of the COL application, and planning and support for preconstruction and construction activities~~ for Fermi 3.

site specific support of the reactor technology vendor, design of other support facilities not provided by the reactor technology vendor, site planning and associated activities, preconstruction planning, and construction support

1.2.6 **Authority to Stop Work**

Quality assurance and inspection work in progress which is not being performed in accordance with approved procedures or where safety or SSC integrity may be jeopardized. This extends to off-site work performed by suppliers that furnish safety-related materials and services to Fermi 3.

1.2.7 **Quality Assurance Organizational Independence**

For the Design and Construction phase, independence shall be maintained between the organization or organizations performing the checking (quality assurance and control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

1.2.8 **NQA-1-1994 Commitment**

In establishing its organizational structure, Fermi 3 commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.

Insert 2B

, identified in FSAR Subsection 1.4.2.1,

1.3 **Fermi 3 Operational Organization**

This section describes the organizational structure for the operational activities of Fermi 3 and the Fermi 3 Site organizational structure is shown in Figure II.1-3.

Insert 1C

1.3.1 **Chairman and CEO**

The Chairman/CEO is responsible for all aspects of design, construction and operation of Detroit Edison's nuclear plants as described in Section 1.1.1

Insert 10

1.3.2.1 **Senior Vice President / CNO**

Markups to Revision 2

Insert 1A

The Pre-COL organizational structure applies to the Pre-COL phase, which encompasses the activities associated with the COL application process, including pre-COL design activities associated with adapting the ESBWR DCD design to site specific conditions and other activities. The Pre-COL phase may overlap temporally with the Design and Construction Phase. Pre-COL activities will phase out as Fermi 3 transitions into the next project phase. Transition activities are described in Section 1.1.8.

Insert 1B

The Design and Construction organizational structure applies to the Design and Construction (D&C) phase associated with developing Fermi 3 detailed design and construction of the Fermi 3 plant. The D&C phase includes detailed site specific design activities and construction activities associated with the Fermi 3 project as well as other associated activities. The Design and Construction phase may overlap temporally with the Pre-COL phase in the beginning of the D&C phase and with the Operations phase at the end of the D&C phase. D&C activities will phase out as the Fermi 3 project transitions into the next project phase. D&C transition activities are described in Sections 1.1.8 and 1.2.9.

Insert 1C

The Operations organizational structure applies to the Operational phase of the Fermi 3 plant. The Operations phase activities are initiated upon the completion of systems construction (or portions thereof) and continues throughout the life on the Fermi 3 plant. The Operations phase may overlap temporally with the Design and Construction phase. Transition activities to Operations are described in QAPD Section 1.2.9.

Insert 2A

1.1.8 Transition from Pre-COL to Design and Construction.

Upon commencement of Design and Construction activities, those positions which are identified for the Design and Construction (D&C) phase, QAPD Section 1.2, will be staffed and have the appropriate authority required to perform design and construction activities. Those positions required to support Pre-COL activities will retain their applicable responsibilities until it is deemed that they are no longer necessary. Oversight, configuration, design, and construction responsibilities are transitioned as discussed below for each transitional position. During the transition, responsibilities will be clearly defined in instructions and procedures to ensure appropriate authority is maintained for each SSC.

The Chairman and CEO position described in QAPD Sections 1.1.1, 1.2.1, and 1.3.1 transitions throughout each project phase and maintains responsibility for Fermi 3.

The Sr. VP / CNO position described in QAPD Sections 1.1.3.1, 1.2.3.1, and 1.3.2.1 transitions through each project phase and maintains responsibility for Detroit Edison nuclear facilities.

The MEP Organization, including Sr. VP MEP (Section 1.1.2.1), Director Nuclear Development (Section 1.1.2.2.1), Director Nuclear Licensing and Engineering (Section 1.1.2.2.2.1), COLA Contractor (1.1.2.2.2.3), Reactor Technology Vendor (Section 1.1.2.2.2.2), and Director MEP Program Office (Section 1.1.2.3.1) transitions from the Pre-COL phase to the Design and Construction phase as D&C activities commence. Position responsibilities and activities described in the Pre-COL phase transition to the position responsibilities and activities of the Design and Construction phase (Sections 1.2.2.1, 1.2.2.2.1, 1.2.2.2.2.1, 1.2.2.2.2.2, 1.2.5.2, and 1.2.2.3.1).

The Director, Quality Management position described in QAPD Sections 1.1.3.2.1, 1.2.3.2.1, and 1.3.2.2.1 transitions through each project phase and maintains responsibility for the Fermi 3 QA program as described. Upon commencement of D&C activities, the Fermi 3 Quality Assurance Project Manager position described in Section 1.2.3.2.1.1 is activated.

The Director, Corporate Services position described in QAPD Sections 1.1.4.1, 1.2.4.1, and 1.3.4.1 transition through each project phase and maintains responsibilities for corporate services as described.

Commencement of D&C activities includes establishment of an Engineering Procurement and Construction (EPC) Contractor, QAPD Section 1.2.5, EPC Executive, Section 1.2.5.1, and Architect / Engineer (A/E), Section 1.2.5.3. The Reactor Technology Vendor scope described in Section 1.1.2.2.2.2 is transitioned to encompass the definition of Section 1.2.5.2.

Insert 2B

1.2.9 Transition from Design and Construction to Operations

[START COM FSAR-17AA-002] No later than six months prior to fuel load of the unit, those positions which are identified for Operations (QAPD Section 1.3) will be staffed and have the appropriate authority required to perform operations activities. **[END COM FSAR-17AA-002]** It is anticipated that even after fuel load, construction activities will be ongoing. Those positions required to support these activities will retain their applicable construction / preoperational responsibilities until it is deemed that they are no longer necessary. As the construction of systems (or portions thereof) are completed, control and authority (including oversight, configuration and operations) is transferred from the EPC contractor to the applicable Fermi 3 departments having cognizance in the operations phase. During the transition, responsibilities will be clearly defined in instructions and procedures to ensure appropriate authority is maintained for each structure, system, and component.

The Chairman and CEO position described in QAPD Sections 1.1.1, 1.2.1, and 1.3.1 transitions throughout each project phase and maintains overall responsibility for Fermi 3.

The Sr. VP / CNO position described in QAPD Sections 1.1.3.1, 1.2.3.1, and 1.3.2.1 transitions through each project phase and maintains responsibility for Detroit Edison nuclear facilities.

The MEP Organization, including Sr. VP MEP (Section 1.2.2.1), Director Nuclear Development (Section 1.2.2.2.1), Director Nuclear Licensing and Engineering (Section 1.2.2.2.2.1), COLA Contractor (1.2.2.2.2.2), and Director MEP Program Office (Section 1.2.2.3.1) are not maintained in the Operations phase. The position responsibilities defined in the D&C phase will diminish as the D&C activities are completed. Operational functions will be in place as discussed above and in the Operations phase of the organizational description.

The Director, Quality Management position described in QAPD Sections 1.1.3.2.1, 1.2.3.2.1, and 1.3.2.2.1 transitions through each project phase and maintains responsibility for the Fermi 3 QA program as described. Upon completion of D&C activities, the Fermi 3 Quality Assurance Project Manager position described in Section 1.2.3.2.1.1 is eliminated and the responsibilities related to Fermi 3 Operations are transferred to the Fermi 3 Quality Assurance Manager as described in Section 1.3.2.2.1.1.

The Director, Corporate Services position described in QAPD Sections 1.1.4.1, 1.2.4.1, and 1.3.4.1 transition through each project phase and maintains responsibilities for corporate services as described.

Upon completion of D&C activities, the EPC Contractor, QAPD Section 1.2.5, EPC Executive, Section 1.2.5.1, Reactor Technology Vendor, Section 1.2.5.2, and Architect / Engineer (A/E), Section 1.2.5.3, transfer control and authority to the Operational organization, QAPD Section 1.3, under the Senior Vice President / CNO, Section 1.3.2.1.

Attachment 5
NRC3-10-0034

Response to RAI Letter No. 37
(eRAI Tracking No. 4813)

RAI Question No. 17.5-22

NRC RAI 17.5-22

10 CFR 50.34(f)(3)(iii)(B) states an applicant's quality assurance (QA) program is based on consideration of performing quality assurance/quality control functions at construction sites to the maximum feasible extent.

SRP Section 17.5 part II, subsection A, "Organization," states that the applicant's QAPD should 1) contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces, 2) include the onsite and offsite organizational elements that function under the cognizance of the QA program, 3) define the interface responsibilities for multiple organizations.

The NRC endorsed the Nuclear Energy Institute (NEI) QAPD template (NEI 06-14, Revision 7, "Quality Assurance Program Description") as a method for providing a QAPD that meets the requirements of 10 CFR Part 50, Appendix B.

Attachment 6 to NRC3-09-0027, "Detroit Edison Company Response to NRC RAI Letter No.10," dated September 30, 2009, states FSAR Appendix 17AA, Part II, Section 1, Fermi 3 QAPD "Organization" will be revised to reflect NEI 06-14, Revision 7.

Proposed changes to the Fermi 3 QAPD (FSAR Appendix 17AA) Part II, Section 1, provided as part of Attachment 11 to NRC3-10-0016, "Detroit Edison Company Response to NRC Request for Additional Information Letter No.25," dated April 16, 2010, provides detailed organization and position descriptions for the pre-COL, design and construction, and operational organizations.

Please clarify the following for proposed changes to section 1 of the QAPD, Part II:

a) *Section 1.2.2.2.1 states the Director, Nuclear Development reports to the Sr. VP MEP and to the CNO and is responsible for the implementation of quality assurance requirements in the areas specified by the QAPD. Please clarify the "specified" areas in the QAPD and who has responsibilities for other "unspecified" areas.*

b) *QAPD Figure II.1-2, "Design and Construction Organization (Insert 15)," depicts the Architect/Engineer (1.2.5.3) position without a reporting line. Please clarify the Architect/Engineer reporting structure.*

c) *QAPD Figure II.1-3, "Fermi 3 Site Organization (Insert 16)," appears to indicate all depicted positions are located onsite (based on the title), but some positions appear to be corporate positions. Please clarify which positions are located on the Fermi site.*

d) *Both QAPD Figure II.1-2, "Design and Construction Organization (Insert 15)," and QAPD Figure II.1-3, "Fermi 3 Site Organization (Insert 16)," show all Fermi 3 QA positions located offsite. Please include any onsite QA personnel in the position*

descriptions and organization charts in section 1, or describe how offsite QA staff coordinates onsite quality activities for the various Fermi 3 phases.

Note: This RAI is supplemental to RAI 17.5-13 included in NRC RAI Letter No. 25, dated March 2, 2010.

Response

a) *Section 1.2.2.2.1 states the Director, Nuclear Development reports to the Sr. VP MEP and to the CNO and is responsible for the implementation of quality assurance requirements in the areas specified by the QAPD. Please clarify the "specified" areas in the QAPD and who has responsibilities for other "unspecified" areas.*

The Director, Nuclear Development is responsible for implementing quality assurance requirements, including management of the corrective action and non-conformance processes. The statement in QAPD Section 1.2.2.2.1 will be clarified to read; "Director, Nuclear Development reports to the Sr. VP MEP and to the CNO and is responsible for implementation of quality assurance requirements specified by the QAPD, including management of the corrective action and non-conformance processes."

b) *QAPD Figure II.1-2, "Design and Construction Organization (Insert 15)," depicts the Architect/Engineer (1.2.5.3) position without a reporting line. Please clarify the Architect/Engineer reporting structure.*

The Architect/Engineer (AE) reports to the Engineering Procurement Construction (EPC) Executive. QAPD Figure II.1-2 and FSAR Chapter 13 Figure 13.1-201 will be revised to clarify this reporting relationship.

c) *QAPD Figure II.1-3, "Fermi 3 Site Organization (Insert 16)," appears to indicate all depicted positions are located onsite (based on the title), but some positions appear to be corporate positions. Please clarify which positions are located on the Fermi site.*

Within QAPD Figure II.1-3, "Fermi 3 Site Organization", the Chief Executive Officer (CEO), Chief Operations Officer (COO), Chief Financial Officer (CFO), and Director Corporate Services positions are not located on the Fermi site. All other positions represented on Figure II.1-3 are anticipated to be located onsite. QAPD Figure II.1-3 will be revised to clarify position locations. The organizational descriptions of the Design and Construction phase Site Organization (QAPD Section 1.2.3.3), and the Operations phase Fermi 3 Site Organization (QAPD Section 1.3.3) do not exclusively define organizational locations, the organizational titles are representative of the responsibilities and functions of the organizations, not the locations of these organizations. Fermi 3 QAPD Figures II.1-2 and II.1-3 will be revised to clarify position locations.

d) *Both QAPD Figure II.1-2, "Design and Construction Organization (Insert 15)," and QAPD Figure II.1-3, "Fermi 3 Site Organization (Insert 16)," show all Fermi 3 QA positions*

located offsite. Please include any onsite QA personnel in the position descriptions and organization charts in section 1, or describe how offsite QA staff coordinates onsite quality activities for the various Fermi 3 phases.

The organizational descriptions of the Design and Construction phase Site Organization (QAPD Section 1.2.3.3), and the Operations phase Fermi 3 Site Organization (QAPD Section 1.3.3) do not exclusively define organizational locations, the titles are representative of the functions of the organizations, not the locations of these organizations. Fermi 3 QAPD Figures II.1-2 and II.1-3 will be revised to clarify that Fermi 3 QA positions will be located on the Fermi site.

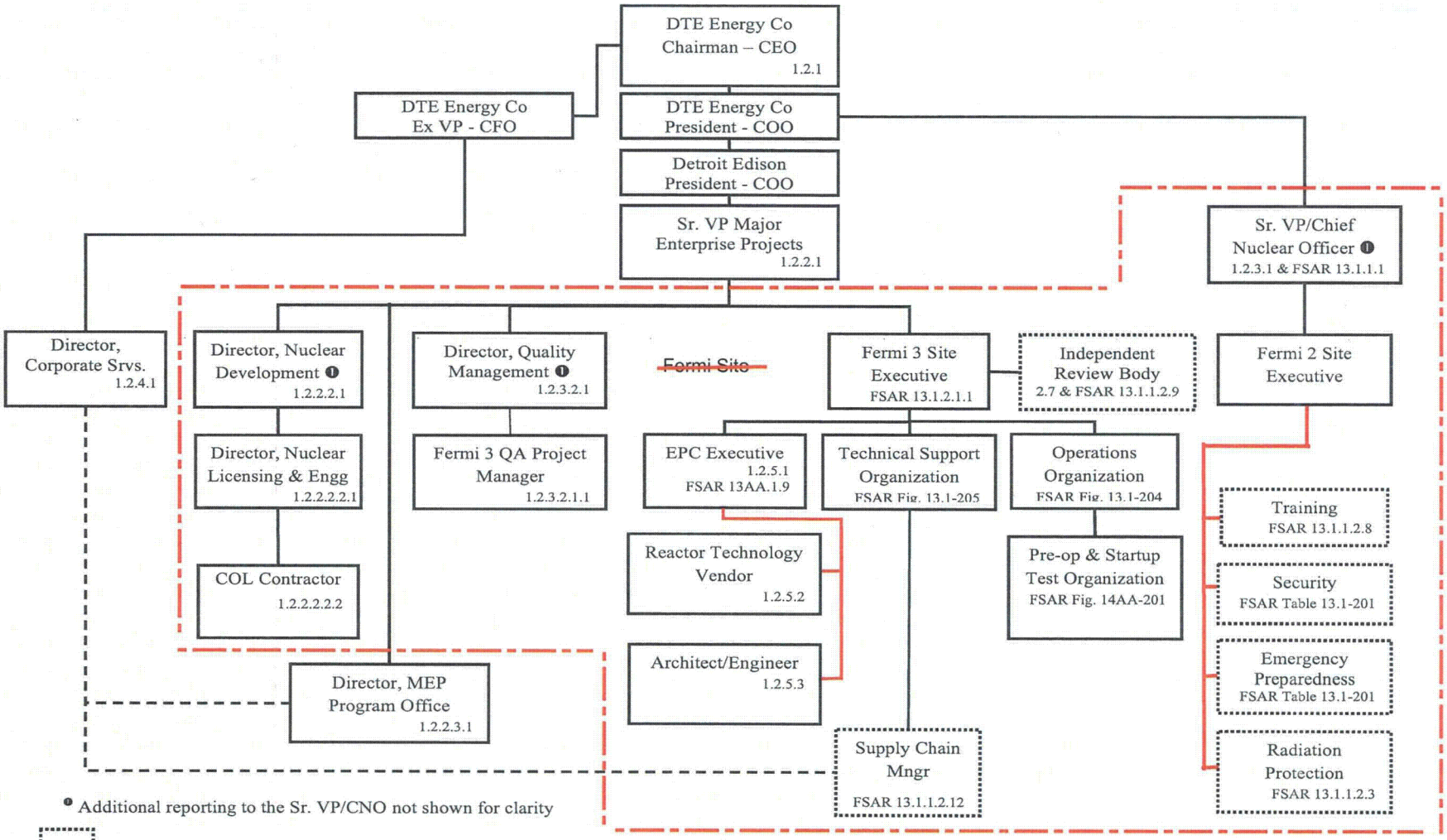
Proposed COLA Revision

Fermi 3 QAPD Section 1.2.2.2.1, QAPD Figures II.1-2 and II.1-3, and FSAR Chapter 13 Figure 13.1-201 will be revised as shown on the attached markups to address the issues discussed above.

Markup of Detroit Edison COLA
(following 4 pages)

The following markup represents how Detroit Edison intends to reflect this RAI response in a future submittal of the Fermi 3 COLA. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be different than presented here.

Figure 13.1-201 Design and Construction Organization [EF3 COL 13.1-1-A]



MEP

through construction. The Sr. VP MEP is also responsible for establishing and managing contracts for the development of new nuclear generation. The Sr. VP MEP shall transition the ~~Nuclear Development~~ organization through the Pre-COL / Design and Construction / Operations responsibilities described in the QAPD, as those Fermi 3 activities commence.

Insert 5

1.2.2.2.1 **Director, Nuclear Development**

The Director, Nuclear Development reports to the Sr. VP MEP and to the CNO and is responsible for the implementation of quality assurance requirements ~~in the areas~~ specified by the QAPD. For the purposes of this program, the description of the duties of the Director Nuclear Development and the Nuclear Development staff will be limited to those activities that support the Fermi 3 Design and Construction activities.

1.2.2.2.2 **Nuclear Development, Nuclear Licensing and Engineering**

The Nuclear Development Licensing and Engineering (NDLE) organization is responsible for support of the Nuclear Development organization by providing engineering, licensing and document control support where applicable.

, including management of the corrective action and non-conformance process

1.2.2.2.2.1 **Director, Nuclear Licensing and Engineering**

The Director, Nuclear Licensing and Engineering reports to the Director Nuclear Development and is responsible for the administration of engineering, nuclear fuel and nuclear licensing and support activities for Fermi 3 under the QAPD.

, identified in FSAR Subsection 1.4.3, reports to the Director, Nuclear Licensing and Engineering and

1.2.2.2.2.2 **COL Contractor**

The COL Contractor provides engineering services in support of licensing activities necessary to support updates, changes, etc. to the COL. These engineering services include site-specific license engineering, and design activities necessary to support development of proposed COL updates, changes etc., and planning and support for preconstruction and construction of Fermi 3.

1.2.2.3 **MEP Program Office**

The MEP Program Office is responsible for supporting the Nuclear Development organization through performing activities related to procurement, budget, planning, etc. where applicable.

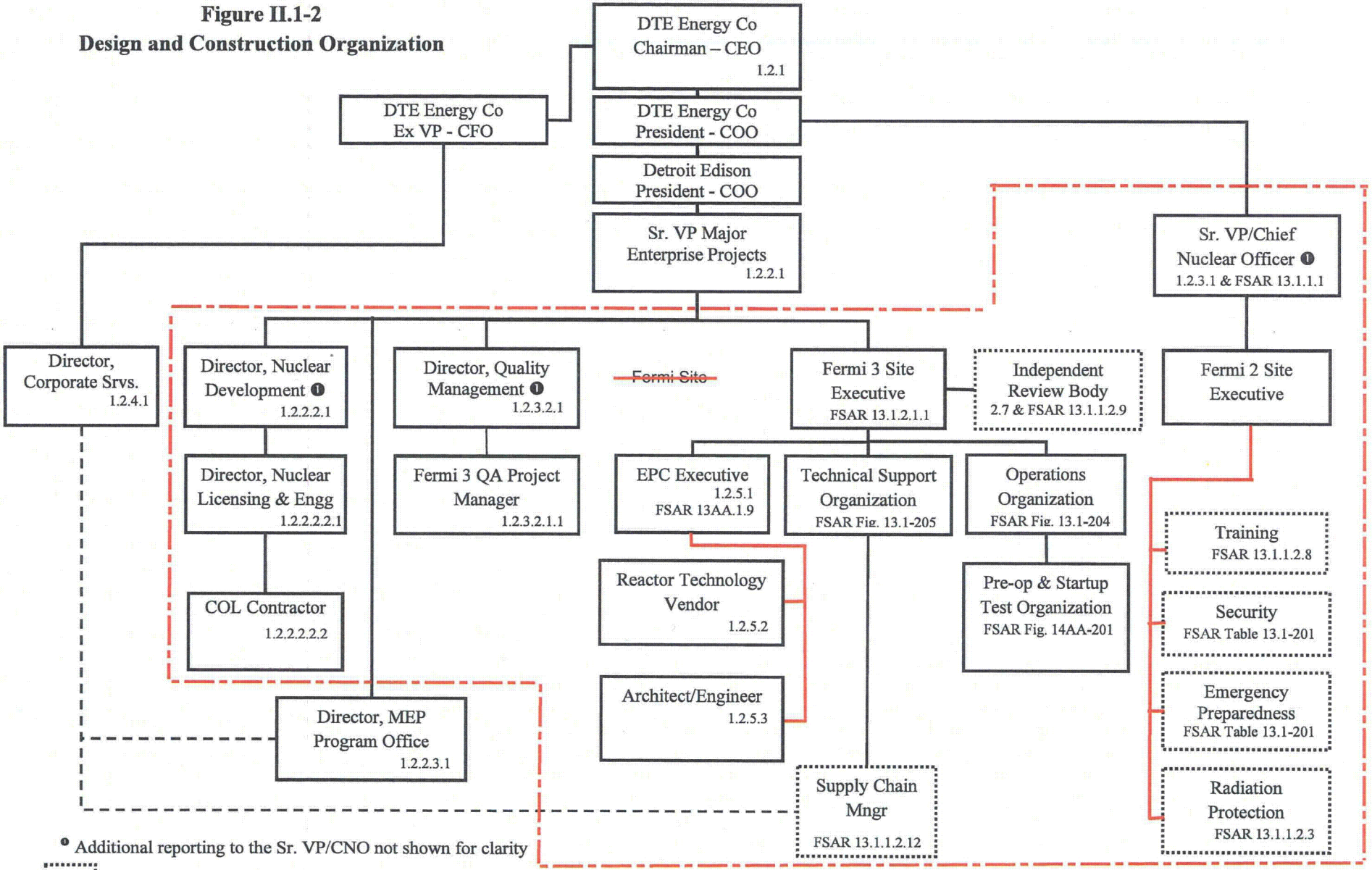
1.2.2.3.1 **Director, MEP Program Office**

The Director, MEP Program Office reports to the Sr. VP MEP and is responsible for managing the MEP support functions for Nuclear Development activities in accordance with the QAPD.

~~1.2.3 Corporate Services~~

~~The Corporate Services organization is responsible for supporting the Nuclear Development organization through performing activities related to procurement, contract management, business performance, records management, logistics, etc., where applicable.~~

Figure II.1-2
Design and Construction Organization



❶ Additional reporting to the Sr. VP/CNO not shown for clarity

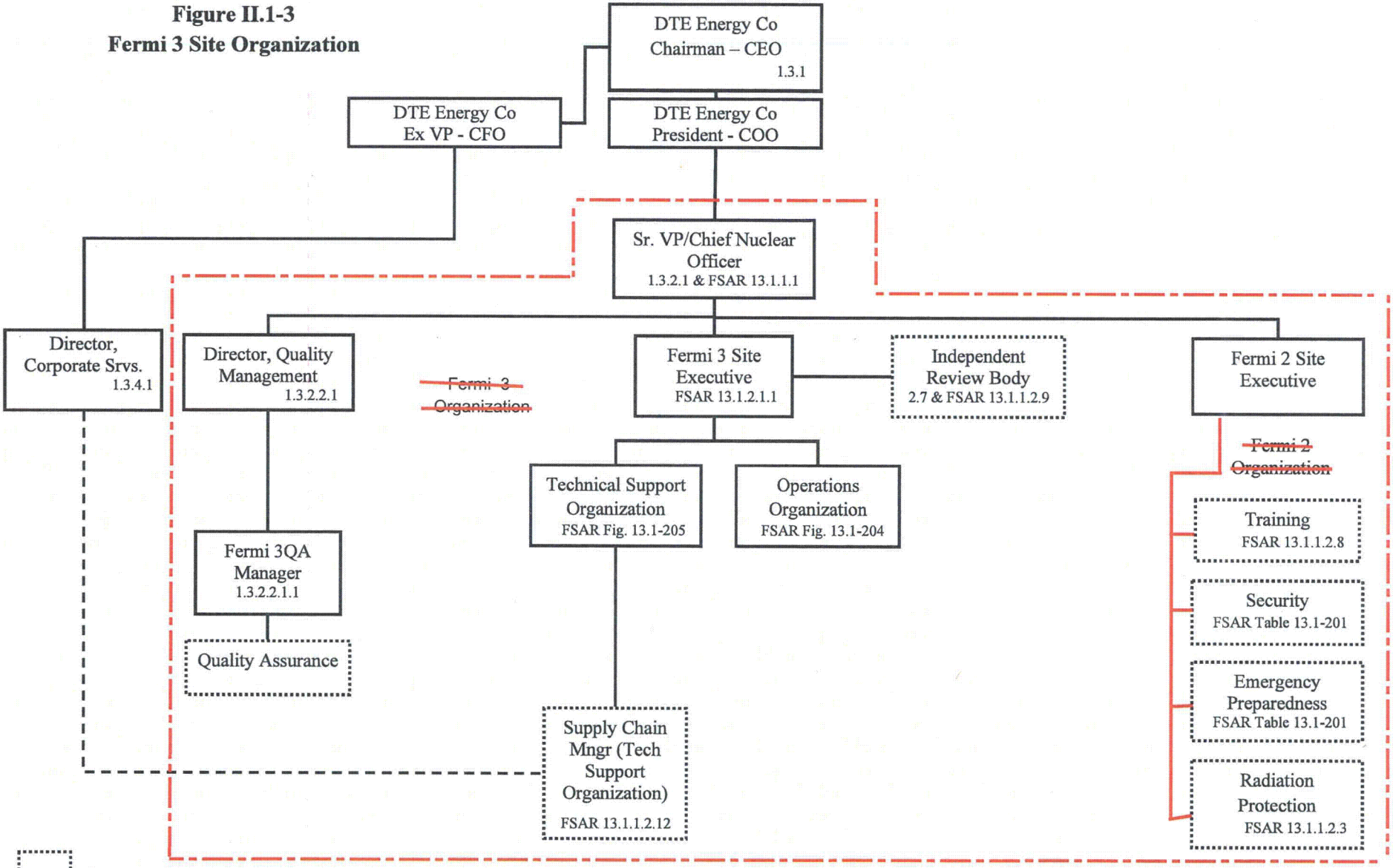
Indicates organizations that, although separate, share resources with Fermi 2 but a single management organization provides oversight for Fermi 3

Signifies functional relationship

Applicable QAPD section numbers are cross referenced above for additional detail. "FSAR" prefix represents FSAR indicated cross reference to Chapter 13 section or figure

- Indicates onsite positions. Positions locations outside this border are not defined onsite.

Figure II.1-3
Fermi 3 Site Organization



Indicates organizations that, although separate, share resources with Fermi 2 but a single management organization provides oversight for Fermi 3

Signifies functional relationship

Applicable QAPD section numbers are cross referenced above for additional detail. "FSAR" prefix represents FSAR indicated cross reference to Chapter 13 section or figure

- Indicates onsite positions. Positions locations outside this border are not defined onsite.