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| Document Number: NK38-PLAN-09701-10067 | Usage Classification: |
| Sheet Number: 0015 | Revision: R000 |

Title:

Program Licensing Management Plan

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Program Licensing Management Plan

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Revision Summary

| Revision Number | Date | Comments |
|-----------------|--------------|---|
| R000 | May 10, 2011 | Initial issue |
| R001 | | <p>General – update to reflect milestones completed and new milestones added.</p> <p>S1.0 Template revision eliminates the first paragraph and reformats the second paragraph.</p> <p>S2.0 First paragraph deleted as unnecessary.</p> <p>S4.0 First paragraph reformatted due to new template.</p> <p>S4.0 Second paragraph clarified that DLA function is for Refurbishment planning and preparation only.</p> <p>S4.0 Last paragraph. Last line deleted as transition will be established during preparation of the MOU.</p> <p>S.5.0 (1) Licensing Plan renamed Regulatory Interface Plan. Description and completion criteria updated.</p> <p>S.5.0 (2) Milestone met - Additional Report submitted to CNSC (NK38-CORR-00531-15775). Replaced with new milestone of Licensing Plan.</p> <p>S.5.0 (3) Milestone met - Licence renewal application submitted to CNSC (NK38-CORR-00531-15556). Replaced with new milestone of Protocol-2.</p> <p>S.5.0 (5) Completion criteria reviewed to reflect that CNSC provides assessment, not acceptance.</p> <p>S.5.0 (7) Change description from “prepare and submit in accordance with Class I Regulations” to “support preparation of application for licence renewal and preparation for hearings”.</p> <p>S.5.0 (9) Split into two milestones (see S.5(11)).</p> <p>S.5.0 (10) New milestone added in accordance with licence requirements.</p> <p>S.5.0 (13) New milestone added in accordance with licence requirements.</p> <p>S.7.0 Table updated.</p> <p>S.8.1 Tables Resources requirements revised based on current forecasts.</p> <p>S.9.0 bullet 9.2 (previous issue) deleted as no longer necessary</p> <p>S.9.0 bullet 9.3 deleted as Additional Report complete and issued.</p> <p>S.9.0(4) and (5) Assumptions revised upon consideration of latest CNSC Activity Plan and Fee Estimate and latest hearing schedule.</p> <p>S.9.0(6) Revised to reflect that NRAD is now responsible for obtaining export licences and permits.</p> <p>S.9.0(7) CNSC time required to turnaround complex submissions is 6 months, so RO-6 undated to RO-9.</p> <p>S.10.1 Third bullet on Protocol-2 replaces previous bullet on seeking PROL renewal in 2011 as it is no longer relevant.</p> <p>S.10.1 Fourth bullet updated.</p> |

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1.0 PURPOSE

This management plan defines the mission, scope and strategies for the Nuclear Refurbishment Licensing Support Department of the Darlington Refurbishment (DR) Program. In addition, this document describes the major deliverables, activities, organization and staffing plans, assumptions, constraints, risk and mitigation plans associated with the execution of the defined work program by the Division.

2.0 MISSION AND GOALS

The mission of the Refurbishment Licensing Support Department is to maintain and enhance the relationship between OPG and the Canadian Nuclear Safety Commission (CNSC) by identifying and managing regulatory risk, acquiring all CNSC licences and approvals necessary for refurbishment of the Darlington units and assisting DR in complying with the terms of the Darlington Power Reactor Operating Licence (PROL).

The goal of the Refurbishment Licensing Support Department (RLSD) is to manage regulatory uncertainty for DR by identifying regulatory requirements, and ensuring the necessary information is provided to the CNSC to satisfy those requirements, such that the units can be refurbished and returned to service per the approved schedule.

Successful interface with CNSC is critical in meeting the DR overall objective. Communication must be open, honest and forthright.

3.0 SCOPE AND RESPONSIBILITIES

This section briefly and succinctly describes the scope and responsibilities of the RLSD throughout the DR Program life cycle.

RLSD provides the following support to DR:

- Work with the project teams to identify regulatory approvals required through all phases of the project, develop strategies to obtain the approvals and coordinate the application for approvals.
- Provide support to ensure compliance with the terms and conditions of the Nuclear Safety and Control Act, associated regulations, licensing basis, and licences and approvals granted by the CNSC.
- Support preparation of requests for licence renewal and licence amendments for the duration of the DR project – interface with all departments of DR and Darlington Regulatory Affairs Department (DRAD).
- Coordinate OPG appearances at Commission meetings and hearings related to DR – interface with Environmental Assessment, Nuclear Waste

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Management Division (NWMD), DRAD and Nuclear Regulatory Affairs Directorate (NRAD).

- Complete documentation of conformance with licensing basis per CNSC Regulatory Document RD-360 as well as address new CNSC Safety and Control areas of Conventional Safety, Waste Management, Decommissioning and Packaging & Transportation – interface with NRAD, DRAD, NWMD, Conventional Safety, Darlington Maintenance Department.
- Manage the Regulatory Interface with the CNSC by ensuring the CNSC is informed of project status and needs through routine meetings with the CNSC Project Manager and CNSC Senior Management as well as focused meetings with the CNSC specialist organizations.
- Manage verbal and written communications with the CNSC related to DR – interface with all DR departments.
- Ensure regulatory commitments for DR are identified, assigned, and monitored to completion – interface with all DR departments.
- Provide advice and support on the management and resolution of regulatory issues.
- Complete S-99 unscheduled (event) reporting and support DRAD S-99 scheduled (routine) reporting on units under the control of the Refurbishment organization.
- RLSD works closely with the Darlington Regulatory Affairs Department (DRAD).

The RLSD Manager is the Designated Licensing Authority for specific issues and CNSC communications regarding DR. The DRAD Manager is the Designated Licensing Authority for specific issues and CNSC communications regarding the Darlington PROL.

The Project funds a Section Manager position within DRAD to ensure station Regulatory Affairs input on all relevant aspects of DR. This position reports to the Manager, DRAD. Work in support of DR is assigned by the Manager, RLSD.

Roles and responsibilities during execution of the outages require further clarification, particularly with respect to routine and non-routine reporting to the CNSC and DLA functions.

4.0 STRATEGY

The Refurbishment Licensing Support Department will employ the following strategies to meet its mission and goals.

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NRAD established a separate department (RLSD) staffed with a small number of experienced staff dedicated to the support of DR. The department consists of a Regulatory Affairs Manager and senior advisors, all of whom are fully funded by DR. Administrative Assistant support is provided by DR. The DLA function for Refurbishment planning/preparation is the responsibility of the RLSD Manager.

In addition, DR funds a position within the Darlington station Regulatory Affairs Department to carry out DR work on behalf of DRAD.

As the project transitions from the planning/preparation phase to the execution phase, the nature of the work will change to include responsibility for the units in Refurbishment, such as S-99 event reporting, to minimize the impact on DRAD support for operating units. However, efficiencies would be realized by having DRAD continue to manage preparation of routine S-99 reports with the information required for Refurbishment units provided by the Refurbishment organization. The division of responsibilities between the two organizations will be clearly established through a memorandum of understanding which will be put in place prior to the first unit outage.

5.0 MILESTONES AND KEY DATES

This section lists the milestones and key dates in the work scope of RLSD throughout the DR Program life cycle.

| No. | Milestone Name | Key Date | Responsible | Accountable | Description | Completion Criteria |
|-----|---------------------------|--------------|-------------------|-------------|---|---|
| 1 | Regulatory Interface Plan | Dec 30 2011 | Sr. Advisor, RLSD | Mgr, RLSD | Identifies regulatory requirements, potential issues, initial list of approval or notifications, strategies and interfaces for 2011 – 2024. | Complete – R1 issued in Passport. Documented will continue to be updated as needed. |
| 2 | Licensing Plan | Oct 31, 2012 | Section Mgr, DRAD | Mgr, RLSD | Initial issue of schedule of required CNSC approvals and acceptances. | Dates and deliverables for submissions to address approvals & issues input to project schedule. |

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| No. | Milestone Name | Key Date | Responsible | Accountable | Description | Completion Criteria |
|-----|--|--------------|---|-----------------------|---|--|
| 3 | Protocol-2 | Mar 31, 2013 | Mgr, RLSD | Mgr, RLSD | Establish a second protocol for regulatory activities to execution which are not covered in the Protocol-1. | Protocol-2 signed into effect. |
| 4 | Environmental Assessment (EA) | Dec 15 2012 | Sr. Advisor, RLSD (EA responsible for preparation of the report.) | Mgr, RLSD | Facilitate CNSC submission and review of EA prepared in accordance with CEAA. Coordinate appearance before the Commission. | Record of Proceedings with Commission decision issued approving the EA. |
| 5 | Integrated Safety Review (ISR), including aggregate assessment | Jul 5 2013 | Sr. Advisor, RLSD (Nuclear Safety responsible for preparing the final ISR) | Mgr, RLSD | Facilitate CNSC submission and review of safety factor reports and final ISR prepared in accordance with RD-360. | CNSC staff letter providing assessment of final ISR, supporting SFRs and CRRs. |
| 6 | Global Assessment and Integrated Improvement Plan (GA/IIP) | Dec 31 2014 | Sr. Advisor, RLSD (Nuclear Safety responsible for preparing the GA/IIP) | Mgr, RLSD | Facilitate CNSC submission and review of GA/IIP prepared in accordance with RD-360. | Amendment or renewal of DN PROL to cover Refurbishment & reference the IIP. |
| 7 | 10 year PROL | Dec 31 2014 | Section Mgr, DRAD | Mgr, DRAD / Mgr, RLSD | Support preparation of application for licence renewal and preparation for hearings. | Renewal of PROL for period 1 Jan 2015 - 31 Dec 2024 |

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| No. | Milestone Name | Key Date | Responsible | Accountable | Description | Completion Criteria |
|-----|---|---------------------------|--|-------------|---|--|
| 8 | Approvals required for Unit outages RO = refurb outage | RO-3 months for each unit | Sr. Advisors, RLSD Section Mgr, DRAD (Project teams & functional groups requiring the approvals prepare the submissions) | Mgr, RLSD | Coordinate preparation of application for approvals and submit to CNSC | CNSC correspondence granting approvals by RO-3 for all requests submitted by RO-09 |
| 9 | Criteria to clear regulatory hold points. | Dec 2014 | Section Mgr, DRAD (Mgr, Return to Service, responsible for preparing the Return to Service (RTS) plan identifying hold points and criteria to clear hold points). | Mgr. RLSD | Facilitate CNSC submission and review of RTS plan per RD-360 with objective of obtaining CNSC pre-approval of acceptance criteria for RTS activities. | LCH issued with regulatory hold points and documentation required to clear. |
| 10 | Submission of RO-6 information required by the LCH | 2016 to 2021 | Sr. Advisors, RLSD Section Mgr, DRAD (Outage Manager responsible for preparation of the submission package) | Mgr. RLSD | List of regulatory undertakings and a Level 2 outage plan Description of the outage management process. Criteria to confirm work (including discovery work) completed satisfactorily and safety-related SSCs RFS. | Letter issued to CNSC with required information attached. |
| 11 | CNSC approval to clear regulatory hold points | 2019 to 2024 | Sr. Advisors, RLSD Section Mgr, DRAD (Mgr, Resident Engineering | Mgr. RLSD | Facilitate submission of info required to demonstrate acceptance criteria | Regulatory hold points removed per schedule |

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| No. | Milestone Name | Key Date | Responsible | Accountable | Description | Completion Criteria |
|-----|--|--------------|---|------------------------|--|---|
| | | | responsible for preparing the Return to Service (RTS) plan identifying hold points, acceptance criteria and commissioning specs.) | | satisfied. | |
| 12 | Submit RO+2 (or 60 calendar days) information required per the LCH | 2019 to 2025 | Sr. Advisors, RLSD Section Mgr, DRAD (Outage Manager responsible for preparation of the submission package) | Mgr. RLSD or Mgr. DRAD | Statement confirming all regulatory undertakings & major work on safety related SSCs completed and unit safe for operation. Planned or discovery work not completed identified and dispositioned. | Letter issued to CNSC with required information attached. |

6.0 MAJOR WORK AND SUMMARY ACTIVITIES

| No. | Major Work or Summary Activity Name | Start Date | Finish Date | Responsible | Accountable |
|-----|--|------------|---------------------------|-------------|-------------|
| 1. | Identify regulatory approvals required through all phases of the project, develop strategies to obtain the approvals and coordinate the application for approvals. | 2008 | Last unit return to power | Mgr, RLSD | Dir, NRAD |
| 2. | Provide support to ensure compliance with the terms and conditions of the Nuclear Safety and Control Act, associated regulations, licensing basis, and licences and approvals granted by the CNSC. | 2008 | Last unit return to power | Mgr, RLSD | Dir, NRAD |
| 3. | Support preparation of requests for licence renewal and licence amendments for the duration of the DR project | 2010 | Last unit return to power | Mgr, RLSD | Mgr, DRAD |
| 4. | Coordinate OPG appearances at Commission meetings and hearings related to DR | 2012 | Last unit return to power | Mgr, RLSD | VP, NRP |

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| 5. | Prepare a report to complete documentation of conformance with licensing basis per CNSC Regulatory Document RD-360 as well as address new CNSC Safety and Control areas | Feb 2011 | Dec 2011 complete | Sr Advisor, RLSD | Mgr, RLSD |
| 6. | Manage the Regulatory Interface with the CNSC by ensuring the CNSC is informed of project status and needs through routine meetings with the CNSC Project Manager and CNSC Senior Management as well as focused meetings with the CNSC specialist organizations. | 2008 | Last unit returned to power | Mgr, RLSD | Dir, NRAD |
| 7. | Manage verbal and written communications with the CNSC related to DR. | 2008 | Last unit returned to power | Mgr, RLSD | Dir, NRAD |
| 8. | Ensure regulatory commitments for DR are identified, assigned, and tracked to completion. | 2008 | 6 months following return to power of last unit | Mgr, RLSD (Mgr, DRAD post RTS) | Dir, NRAD |
| 9. | Provide advice and support on the management and resolution of regulatory issues. | 2008 | Last unit return to power | Mgr, RLSD (Mgr, DRAD post RTS) | Dir, NRAD |
| 10. | Complete S-99 event reporting on the islanded units and support S-99 routine reporting on islanded units. | Breaker open on first unit | Last unit return to power | Mgr, RLSD | Dir, NRAD |

7.0 MANAGEMENT DOCUMENT LIST

In order to effectively manage the DR Program, the applicable nuclear governance will be followed. In addition, a certain number of management methodologies have been and/or will be established.

| No. | Document Name | Start Date | Finish Date | Responsible | Accountable |
|-----|---|---------------------|-------------------------------|-------------------|-------------|
| 1. | NK38-CORR-00531-00651 OPGN-CNSC Protocol for the Conduct of the Integrated Safety Review (ISR) through to the Integrated Implementation Plan (IIP) for the Refurbishment of Darlington NGS 'A' | Issued Oct 4, 2010 | Effective to Dec 31, 2014 | Mgr, RLSD | SVP, DR |
| 2. | NK38-PLAN-00531-10001-R001 Darlington Nuclear Refurbishment – CNSC Regulatory Interface Plan | Issued Mar 29, 2011 | Effective for life of project | Sr. Advisor, RLSD | Mgr, RLSD |

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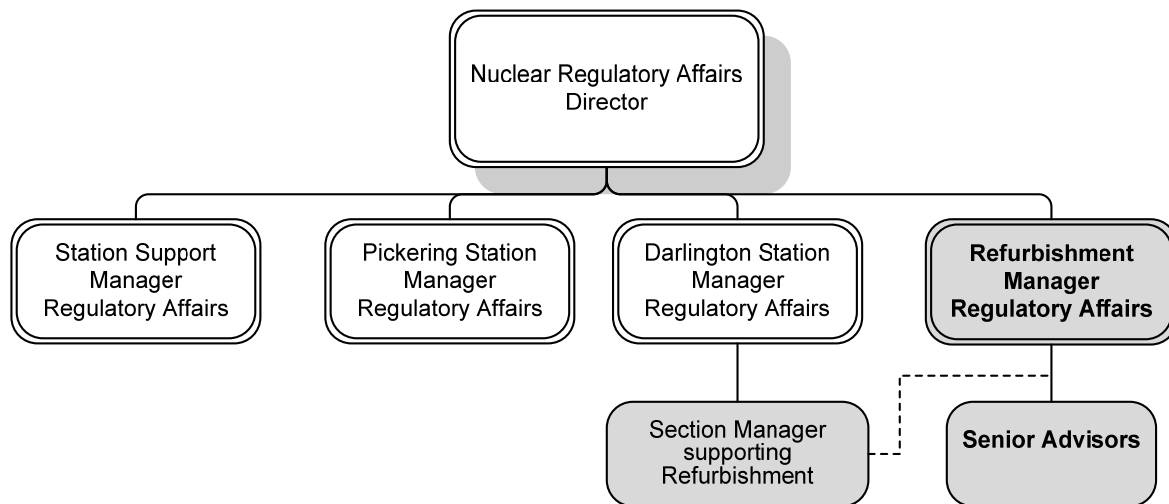
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|----|--|---------------------|-------------------------------|-------------------|-----------|
| 3. | D-GUID-00531-10003 Darlington Nuclear Refurbishment – Request for CNSC Approval or Notification | Issued Mar 30, 2012 | Effective for life of project | Section Mgr, DRAD | Mgr, RLSD |
| 4. | OPGN-CNSC Protocol-2 for regulatory activities not address via the first protocol (line item #1) | May 2012 | Mar 31, 2013 | Mgr, RLSD | SVP, DR |
| 5. | Memorandum of Understanding between DRAD and RLSD | Sep 30, 2012 | Mar 31, 2013 | Section Mgr, DRAD | Mgr, RLSD |

8.0 RESOURCE PLAN

8.1 Organization and Staffing Plan

This section describes the organization and staffing plan of RLSD that is necessary for the completion of the work scope of RLSD.

(a) Organization Chart



The NRAD resources dedicated to Darlington Nuclear Refurbishment are highlighted in grey above.

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Yearly Staff Requirement

The following tables reflect the dedicated resource requirements for the duration of the project.

| Job Family | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 |
|--------------|------|------|------|------|------|------|------|
| Sr. Advisor* | 4 | 4 | 4 | 4 | 5 | 5 | 5 |
| Band G | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| Admin. Asst. | 0.5 | 0.5 | 0.5 | 1 | 1 | 1 | 1 |
| Total | 5.5 | 5.5 | 5.5 | 6 | 7 | 7 | 7 |

| Job Family | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|--------------|------|------|------|------|------|------|
| Sr. Advisor* | 5 | 5 | 4 | 3 | 3 | 1 |
| Band G | 1 | 1 | 1 | 1 | 1 | 0 |
| Admin. Asst. | 1 | 1 | 1 | 1 | 0.5 | 0 |
| Total | 7 | 7.5 | 6 | 5 | 4.5 | 1 |

* At least one of the Senior Advisor positions is a fully funded position within Darlington Regulatory Affairs dedicated to Refurbishment support.

(b) Human Resource Strategy

Staffing is currently in place for the period 2012 to 2016. In 2017, one additional Senior Advisor will be added to provide outage support. This may be via secondment from DRAD (if work load decreases with only three units). If not, hiring will be done internally as this position would require OPG experience, preferably station experience. Further, it is anticipated that there will be staff turnover during the life of the project (retirements or other job opportunities). These positions will be filled through internal hires from Pickering, Darlington or Corporate. Regulatory Affairs core and extended core training will continue to be accessed via Candu Owners Group training or via Nuclear Training.

8.2 Contract List (excluding the major refurb contracts)

| No. | Contract Name | Value | Awarding Time |
|-----|---------------------|--------------|---------------|
| 1 | CNSC Licensing Fees | \$73,100,000 | 2013 to 2025 |

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8.3 Other Business Unit Support

| No. | Division | Support Requirement | Value (High/Med/Low or Level of Effort) | Timeline |
|-----|---|---|---|-------------------------------|
| 1 | Darlington Nuclear | Licence Renewals - SVP, DOM, Director Engineering for appearances before the Commission Various station staff for preparation of application | High | 2011 to 2014, inclusive |
| 2 | Legal | Licence Renewals, Appearances before the Commission, Protocols | High | As above |
| 3 | Nuclear Regulatory Affairs – Central | Advice & guidance on import/export permits as well as other specialized areas. | Level of effort | 2011 to 2023 |
| 4 | Nuclear Waste Management Division | Additional Report EA public hearing support Licence applications | High | 2011 to 2014 inclusive |
| 5 | Nuclear Services | Licence renewal application | High | 2013 to 2014 inclusive |
| 6 | Nuclear Security and Emergency Services | Licence renewal application | High | 2013 to 2014 inclusive |

9.0 ASSUMPTIONS AND CONSTRAINTS

- 1) Routine support from balance of organization (e.g. correspondence reviews, licence applications, etc.) will be accommodated within existing budgets.
- 2) Cost associated with the 2014 renewal of the PROL will be handled by the base organization. Incremental support required (briefing notes, Commission appearances) for the Refurbishment aspect will be absorbed through the Refurbishment funded organization.
- 3) It is assumed that the IIP defining regulatory scope for Refurbishment will be approved based on CNSC staff recommendations.
- 4) Based on estimated fees for the 2012/2013 fiscal year, it is assumed that licensing fees will stay relatively constant (with 10% per year inflation) until the first unit outage. It is further assumed that DN Station licensing fees will be apportioned to Refurbishment based on the # of outage units. A

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nominal fee assumed to 2024 and 2025 for clean up costs. All estimates are based on preliminary information from the CNSC for fiscal year 2012/2013 which indicates a DN Station licensing fee of \$12.3M and a DR licensing fee of and \$1.5M.

- 5) Assumes legal support funded by refurbishment through Supply Chain as follows:
 - 0.2 FTE in June, November and December in 2012 to support relicensing.
 - 0.2 FTE Q4 2013
 - 0.2 FTE each of Q3 & Q4 2014 assuming Day 1 relicensing hearing in August and Day 2 hearing in December
 - FTE 2015 to 2024 assumes a requirement for annual appearances before the Commission to provide a status update of the project.
- 6) It is assumed that export and import licences and permits will be obtained by Nuclear Regulatory Affairs.
- 7) Outage approvals in hand by RO-3 months requires that all designs be complete and all supporting information be available for submission at no greater than RO-9 months.
- 8) It is assumed that annual appearances before the Commission are required throughout the Refurbishment period.
- 9) It is assumed that RLSD personnel will be responsible for all regulatory activities on the units in Refurbishment outages, including S-99 event reporting but not including routine S-99 reporting. The information required for routine reporting will be provided to DRAD and they will manage preparation and submission of these reports.
- 10) It is assumed that management oversight for closeout following last unit RTS provided by Station Manager, Regulatory Affairs.
- 11) It is assumed that all close out activities can be completed within one year of the last unit return to service.

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10.0 RISKS AND MITIGATION MEASURES

10.1 Volume of work for CNSC exceeds resources

Low Risk - Schedule Impact due to delayed approvals

Mitigation measures:

- Established an OPG/CNSC Protocol on regulatory process, key deliverables, and timelines for EA, ISR, IIP (ref. NK38-CORR-00531-00651).
- CNSC has been notified that OPG will be requesting a licence renewal to 2014 at which time OPG will seek a 10 year licence. This would eliminate one licence renewal cycle and the associated demands on CNSC resources to review the applications, prepare a recommendation and appear in front of Commission in two days of public hearing (ref. NK38-CORR-00531-15202).
- A second protocol will be established to provide an administrative framework for regulatory activities not addressed in the first protocol. This will facilitate identification of key deliverables to the CNSC and turnaround of CNSC approvals and/or decisions.
- A request was submitted for CNSC approval to freeze the code effective dates for design-related codes and standards. This will eliminate the large number of reconciliations otherwise anticipated over the duration of the project. The CNSC approval was received June 22, 2012 (N-CORR-00531-05758).
- The Islanding team is putting together a plan which will identify in advance which OP&Ps could be relaxed or modified during each phase of the outage and the criteria to be met to support relaxation. The OP&Ps will be revised in advance to incorporate this information and submitted for approval in advance of the first unit outage. This will eliminate the need for numerous requests for CNSC approval to deviate from individual OP&Ps.
- A Licensing Plan is being prepared and will be periodically updated to identify CNSC approvals, notifications and/or agreements required for the duration of the Refurbishment project. This will identify periods of high demand on CNSC resources and will allow them to plan their work and manage their resources to facilitate timely support of Refurbishment.
- Monthly meetings are held with the CNSC Project Manager to monitor turnaround of actions and/or approvals required. Quarterly meetings are held with the CNSC Senior Management which focuses on OPG priorities and concerns, including timely turnaround of approvals.

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10.2 ISR/EA Issue resolution not accepted by CNSC

Low Risk - Scope Impact due to change in scope

Mitigation measures:

- CNSC communication strategies are in place to facilitate early identification and resolution of CNSC concerns regarding: the evaluations being carried out, including scope and methodologies, the gaps identified in the evaluations and the proposed resolution of gaps.
- The OPG/CNSC protocol commits to providing regulatory oversight of the production of deliverables by OPGN. CNSC is meeting this commitment by having appointed a CNSC project manager who meets monthly with personnel responsible for production of these deliverables.
- The criteria against which CNSC staff will evaluate the ISR are contained in a CNSC Staff Review Guide referenced in the OPG/CNSC protocol.
- The protocol also describes an issues resolution process for timely review and resolution of disagreements which may arise on results of the ISR and the IIP.
- There is a very small risk that the Commission may not approve the IIP as recommended by CNSC staff and will require additional changes.

10.3 Changing regulatory requirements

Low Risk - Schedule and Scope Impact

Mitigating Measures

- A guiding principle in the OPG/CNSC protocol is that all activities performed for the ISR process described in Regulatory Document RD-360 will be based on CNSC requirements that are current at the time of the accepted Code Effective Date, with additional requirements documented in formal correspondence. This will assist in minimizing changing regulatory requirements during the definition of regulatory scope for the project.
- New regulatory requirements are typically added to licences during licence renewal. A 10 year licence in 2014 will minimize the number of regulatory requirements added to licensing basis over the period of Refurbishment.
- CNSC acceptance of OPGs proposal to freeze the code effective dates for design work will help to minimize the impact of changing regulatory requirements due to revisions to codes and standards.
- Engineering is identifying hold points for return to service of the units and the criteria to be met to remove these hold points, including commissioning

Plan

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specifications. OPG will seek prior approval of these elements at the time of licence renewal.

11.0 OTHER SUGGESTIONS

N/A