



Summary of CNSC Pre-Licensing Review

Assessment of NWMO Procurement Processes and Activities for Site Characterization Step 3, Phase 2

April 2018

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1.0 Introduction

The Canadian Nuclear Safety Commission (CNSC) regulates the use of nuclear energy and materials to protect health, safety, security and the environment; to implement Canada's international commitments on the peaceful use of nuclear energy; and to disseminate objective scientific, technical and regulatory information to the public.

As a best practice, the CNSC gets involved early in any proposed new nuclear project to provide future applicants with information and guidance on the regulatory requirements and licensing process before the submission of a licence application and the initiation of the environmental assessment process.

The Nuclear Waste Management Organization (NWMO) is the implementer for the deep geological repository for Canada's used nuclear fuel. No licence application has been submitted at this time; however, the CNSC signed a service arrangement with the NWMO to provide regulatory guidance in relation to the adaptive phased management (APM) approach.

CNSC staff can provide the optional service of a pre-licensing review to future licence applicants. The objective of a pre-licensing review is to increase regulatory certainty while ensuring public safety. This pre-licensing assessment of the NWMO's procurement processes and activities for site characterization does not involve issuing a licence under the *Nuclear Safety and Control Act* (NSCA) and is not required as part of the licensing process for the deep geological repository (DGR). The conclusions do not bind or otherwise influence the decisions made by the Commission.

2.0 Summary

CNSC staff performed a pre-licensing assessment based on the criteria identified in the CNSC Specific Guide *Vendor Assessment for APM Initiative*, which included applicable requirements from CSA N286-12, *Management system requirements for nuclear facilities*.

The assessment provided NWMO staff with early feedback on their procurement processes and activities for site characterization and provided an opportunity for NWMO staff to learn more about the CNSC's oversight.

CNSC staff concluded that the NWMO has documented and implemented the applicable CSA N286-12 requirements. However, CNSC staff found several areas where the implementation of programmatic requirements was not sufficient at this time to meet CSA N286-12 requirements or industry best practices. The following six recommendations were issued to the NWMO:

Recommendation NWMO-R01: CNSC staff recommend that the NWMO consider developing a generic process for lessons learned that should be described in the NWMO documentation.

Recommendation NWMO-R02: CNSC staff recommend that the NWMO globally assess the adequacy of the corrective actions taken as detailed in the response to CNSC staff's assessment, specifically for managing the effectiveness of the changes and how the effectiveness change control process meets CSA N286-12, clause 4.10.

Recommendation NWMO-R03: CNSC staff recommend that the NWMO consider revising NWMO-STD-AD-0001, *Governance Process Description* to provide details about instruction-type documents and their place in the documentation hierarchy.

Recommendation NWMO-R04: CNSC staff recommend that the NWMO consider developing a generic process to ensure that a list with all records for each project will be generated and that the list is also a deliverable bonded to the contract or request for proposal, if necessary.

Recommendation NWMO-R05: CNSC staff recommend that the NWMO consider developing a generic process to ensure that the NWMO's internal verification plan for the contracted work include a description of the planned monitoring and verification including frequency.

Recommendation NWMO-R06: CNSC staff recommend that the NWMO consider integrating REGDOC-2.2.2, *Personnel Training* requirements in future training activities.

For questions about the review, contact cnsccinfo@ccsn.ca.