



## CANADIAN NUCLEAR SAFETY COMMISSION

### PRRP-G00301 - SCD - DESKTOP INSPECTION GUIDE

#### Public Information and Disclosure Program

**Purpose:** To verify that nuclear power plants are implementing public information and disclosure programs and tactics in their communities in accordance with regulatory requirements.

**Note:**

Please enter any comments, suggestions or requests for revision as tracked changes in:  
CNSC Comments Copy: e-Doc [6956526](#)

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**PREREQUISITES**

<b>CNSC TYPE II INSPECTION GUIDE</b>		<b>Station: DNGS/PNGS</b>	<b>Date of Inspection:</b>	
<b>TITLE: Public Information and Disclosure Protocol</b>			<b>e-Doc: 6775245</b>	
<b>NO.</b>	<b>PREREQUISITES</b>	<b>REQUIREMENTS/STATUS</b>	<b>CHECK</b>	
1.	Check Last Record of Inspection and Follow-up Actions	Actions complete and/or in progress		
2.	Ensure Latest Revision of Inspection Guide	Obtain from list of approved inspection guides (e-Doc 5075411)		
3.	Confirm Station Documents are up to date	Program document references current		
4.	Additional Resources or Special Reports	To be identified by Lead Inspector		
5.	Site Office Notification	Yes		
6.	Licensee Notification	Yes (TBC)		

**REGULATORY REQUIREMENTS and OTHER INSPECTION CRITERIA**

<p>REGULATORY REQUIREMENTS:</p> <ul style="list-style-type: none"><li>• <i>Nuclear Safety and Control Act</i></li><li>• Power Reactor Operating Licence, PROL <b>XX/XX</b> and associated Licence Conditions Handbook (LCH)</li><li>• CSA N286-12, Management System Requirements for Nuclear Facilities</li><li>• REGDOC 3.2.1, Public Information and Disclosure Program</li></ul>	<p>LICENSEE REFERENCES: As per licensee corporate governance, and specific technical requirements identified in the regulatory requirements. See all licensee criteria in 3<sup>rd</sup> column of the guide. <b>Document number – title – revision</b></p> <p>COMPLIANCE VERIFICATION CRITERIA DOCUMENTS – List any documents that may be used as part of this inspection that are listed in the CVC section of the LCH. <b>Document Name/Number - Revision</b></p> <p>OTHER DOCUMENTS – List any other documents that may have been used during this inspection as inspection criteria that were not included in the LCH and is not a Licensee Reference such as IAEA documents or internal CNSC inspection criteria. These documents can only be used to raise recommendations based on best practices. <b>Document Name/Number – Revision</b></p> <p>Please Note CVC Documents and Other Documents do not belong in a specific column of the guide. They can be referenced for a specific line item by referencing the document in the header under the Specific Instructions for this Section.</p>
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## **SECTION 0 – SUGGESTED APPROACH TO EXECUTING THIS INSPECTION**

Other matters of regulatory interest addressed by this guide include Public Information and Disclosure.

A list of documents to be requested may include but are not limited to:

- Public Information and Disclosure Protocol and program documents
- Licensee's communications plan
- evaluation methods and outcomes
- public opinion collection methods and outcomes
- applicable reference documents

Contact assigned site single point of contact (SPOC) identified for the inspection. Once all information is gathered and reviewed, follow-up with SPOC regarding any outstanding questions and required justification.

This guide should be used in association with:

- Type II Inspection Procedure – e-Doc [3596026](#)
- Preparing a Regulatory Compliance Report – e-Doc [4450933](#)

**SECTION 1 – SCA – MANAGEMENT SYSTEM**

**Objective:**

1. To confirm roles and responsibilities are well defined.
2. To confirm that documents are controlled.
3. To confirm that records are documented, maintained and stored securely.
4. To confirm that issues are identified and recorded as problems. These problems are assessed and dispositioned.
5. To confirm self-assessments are being conducted.

**1.1 – SpA – ORGANIZATION (ROLES AND RESPONSIBILITIES)**

**Specific Instructions for this Section:** Obtain a licensee organization chart and governance for producing documents. Choose a sample of 5-10 procedures from section 0.

**Compliant Finding:** The licensee was compliant with the organizational requirements of CSA N286-12, clause 4.4 concerning roles and responsibilities for this inspection.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
1	CSA N286-12, clause 4.4 'Organization'		The licensee's staff responsibilities are clearly defined and communicated to staff.	Verify that roles and responsibilities are documented as per their governance.  Verify that the organization chart matches the procedures. Confirm the organization chart is available to the workforce.  Verify that there are no gaps of responsibility and that the functions of the roles being executed match the procedural responsibilities, for example: <ul style="list-style-type: none"> <li>• who executed, who verified and who approved outputs</li> <li>• if observing active work, verify the person executing the role match governance</li> <li>• chair of meetings match the governance, and that quorum was met</li> </ul>
<b>COMMENT/IMPACT</b>				

**1.2 – SpA – RECORDS MANAGEMENT (DOCUMENT CONTROL)**

**Specific Instructions for this Section:** Choose a sample of 5 to 10 documents from the documents requested in Section 0 to perform this verification. These documents can include programs, procedures or instructions, etc.

**Compliant Finding:** The licensee was compliant with the document control requirements of CSA N286-12, clause 4.7.3 and REGDOC-3.2.1, section 2.4, for the documents reviewed during this inspection.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
2	CSA N286-12, clause 4.7.3 ‘Documents’  REGDOC-3.2.1, section 2.4 ‘Documentation and records’		Documentation is controlled.	Confirm that documents are maintained for the public information disclosure protocol.  Confirm that the sample set of documentation used for producing the outputs observed during the inspection is controlled (for current use) by verifying: <ul style="list-style-type: none"> <li>• documents are uniquely identified</li> <li>• documents meet the defined format and presentation</li> <li>• document status is identified</li> <li>• documents are distributed by a controlled method</li> <li>• documents are revised and reviewed according to procedure the document version being used is not obsolete</li> </ul>
<b>COMMENT/IMPACT</b>				



**1.3 – SpA – RECORDS MANAGEMENT (DISTRIBUTION AND STORAGE)**

**Specific Instructions for this Section:** Request and obtain 5-10 records that were observed during the inspection that must be maintained. These records could include any of the following: media inquiry tracking documents, public inquiry tracking documents, PIDP communications strategy, meeting notes, public/community/stakeholder consultation tracking documents and meeting notes, program evaluation and improvement process documents and records of their public information program and disclosure protocol.

**Compliant Finding:** The licensee was compliant with the records management requirements of CSA N286-12 clause 4.7.4 and REGDOC 3.2.1, section 2.4 for the public information program and disclosure records reviewed during the inspection.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
3	CSA N286-12, clause 4.7.4 ‘Records’  REGDOC 3.2.1, section 2.4 ‘Documentation and records’		Records are documented, maintained and stored securely.	Confirm that records are maintained for the public information disclosure protocol.  Verify that the sample set of records gathered for the inspection meet the following: <ul style="list-style-type: none"> <li>• records are filled out according to procedure</li> <li>• records are clearly identified as permanent or temporary (in procedure or on the record)</li> </ul> Records are being retained and stored according to procedure.  Verify documents and records demonstrate that the implementation of the program is adequate.  Documents and records describing the public information program and its disclosure protocol are maintained for continuing management controls, independent review, submission with a licence application, and for subsequent compliance verification by the CNSC.  Documents and records on public information and disclosure activities should be readily available upon request.
<b>COMMENT/IMPACT</b>				

**1.4 – SpA – OPERATING EXPERIENCE (OPEX)**

**Specific Instructions for this Section:** Obtain and review a sample of PICAs/SCRs in the licensee’s database that was initiated in the last 12 months that were associated with the program.

**Compliant Finding:** The licensee was compliant with the problem identification and resolution requirements of CSA N286-12 clause 4.9 for the PICAs/SCRs that were reviewed during this inspection.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
4	CSA N286-12, clause 4.9 ‘Problem identification and resolution’		Adverse conditions are identified, documented and resolved.	Verify the following in accordance with station expectations: <ul style="list-style-type: none"> <li>• issues are identified and recorded as problems</li> <li>• these problems are assessed/screened and dispositioned</li> <li>• they remain open until actions are complete and are closed once actions are taken</li> <li>• actions taken were appropriate to prevent recurrence</li> <li>• the problems are trended</li> </ul>
<b>COMMENT/IMPACT</b>				
5	CSA N286-12, clause 4.9 ‘Problem identification and resolution’		Adverse conditions discovered during the inspection are documented.	Verify that adverse conditions found by the licensee during the inspection are (in accordance with station expectations): <ul style="list-style-type: none"> <li>• documented (work order and/or SCR/PICA)</li> <li>• tracked</li> <li>• trended where necessary</li> <li>• dispositioned</li> <li>• where necessary, an apparent cause or root cause analysis has been initiated</li> </ul>
<b>COMMENT/IMPACT</b>				

**1.5 – SpA – PERFORMANCE ASSESSMENT, IMPROVEMENT AND MANAGEMENT REVIEW (SELF-ASSESSMENT)**

**Specific Instructions for this Section:** Review the licensee documentation to verify how often the licensee is required to perform self-assessments. Request and obtain the 2 most recent self-assessments.  
 Review licensee documents, communication products and tools, evaluation frequency for each facility. Samples of information materials produced and disseminated, with a detailed description of public information and disclosure activities undertaken. Obtain:

- Three to five examples of products/ tools applicable to each facility
- Evaluation frequency and evaluation plan

**Compliant Finding:** The licensee was compliant with the self-assessment requirements of CSA N286-12, clause 4.11.1 for the self-assessments that were reviewed during this inspection.  
 The licensee was compliant with the program evaluation and improvement requirements of REGDOC 3.2.1, section 2.2.6.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
6	CSA N286-12, clause 4.11.1 'Self-assessment'		The licensee is performing self-assessments.	Verify the licensee is performing self-assessments at the frequency stated in the procedures.  Review the licensee self-assessments to verify the following: <ul style="list-style-type: none"> <li>• whether corrective actions have been initiated</li> <li>• corrective actions have been implemented or have assigned due dates</li> <li>• no repeat events occurred that were documented in previous self-assessments</li> </ul>
<b>COMMENT/IMPACT</b>				

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
7	REGDOC 3.2.1, section 2.2.6 'Program evaluation and improvement process'		The public information program shall include a process for evaluating its performance, developing and implementing measures to improve effectiveness.	<p>The program evaluation and improvement process should describe the proposed method and the timelines for:</p> <ul style="list-style-type: none"> <li>• evaluating the performance of the public information program and disclosure protocol in meeting the stated objectives</li> <li>• the measures implemented or planned to improve its effectiveness</li> </ul> <p>Evaluation methods may include:</p> <ul style="list-style-type: none"> <li>• Surveys (employee, community)</li> <li>• Webstats</li> <li>• Benchmarking</li> <li>• Public inquiries (calls, emails, letters)</li> <li>• Feedback summaries</li> <li>• Any community liaison committee feedback</li> </ul> <p>Review samples of information materials produced and disseminated, with a detailed description of public information and disclosure activities undertaken.</p>
<b>COMMENT/IMPACT</b>				

**SECTION 2 – OTHER MATTERS OF REGULATORY INTEREST – PUBLIC INFORMATION AND DISCLOSURE**

- Objective:**
1. To confirm licensee’s PIDP defines objectives.
  2. To confirm the licensee defines the target audiences.
  3. To confirm that PIDP captures and tracks media and public opinion.
  4. To confirm PIDP provides open and transparent access to public information strategy and products.
  5. To confirm PDIP includes a public disclosure protocol.
  6. To confirm PIDP evaluates performance, develops and implements measure to improve.
  7. To verify accurate contact information is provided.

**2.1 OBJECTIVES**

**Specific Instructions for this Section:** Request corporate vision, mandate or mission statement or specific communications policy.

**Compliant Finding:** The licensee was compliant with the public and media opinion requirements of REGDOC 3.2.1, section 2.2.1, for establishing objectives for their Public Information Program.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
8	REGDOC 3.2.1, section 2.2.1 ‘Objectives’		Objectives are established for the public information program.	Review objectives of the PIDP and: <ul style="list-style-type: none"> <li>• confirm objectives align with overall corporate objectives</li> <li>• confirm objectives are measurable</li> </ul>
<b>COMMENT/IMPACT</b>				

**2.2 TARGET AUDIENCES**

**Specific Instructions for this Section:** Request PIDP communications plan for each facility.

**Compliant Finding:** The licensee was compliant with the target audience requirements of REGDOC 3.2.1, section 2.2.2.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
9	REGDOC 3.2.1, section 2.2.2 'Target audience(s)'		Target audience is defined for the public information program.	Review summary of target audiences and: <ul style="list-style-type: none"> <li>• confirm that the target audience is clearly defined</li> <li>• confirm there is rational for who is included and who is not</li> <li>• confirm audiences include "persons living in the vicinity" to ensure that information reaches as many interested parties as possible</li> </ul>
<b>COMMENT/IMPACT</b>				

**2.3 MEDIA AND PUBLIC OPINION**

**Specific Instructions for this Section:**

- Request long mechanism of public and media inquiries including logs, reactive and any proactive outreach for each facility
- Request sample of tools for public communication, information gathering such as:
  - Opinion polling
  - Surveys
  - Analysis
  - Media coverage
  - Letters from the public and or stakeholders

**Compliant Finding:** The licensee was compliant with the public and media opinion requirements of REGDOC 3.2.1, section 2.2.3.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
10	REGDOC 3.2.1, sections 2.2.3 'Public and Media Opinion'		The public information program identifies and describes community and public views, opinions and concerns, and the means to obtain them.	Confirm: <ul style="list-style-type: none"> <li>• the public information program identifies and describes community and public views, options and concerns in relation to the licenced activity</li> <li>• the licensee has a means to obtain public opinions, views, and concerns</li> </ul> Verify: <ul style="list-style-type: none"> <li>• the tools produced for public information are informed by the public inquiries and reflect the agreement of the protocol</li> <li>• the effort taken by the licensee is commensurate with the level of public interest, the operation of the nuclear facility, and the risks to the health and safety of persons and the environment associated with the facility</li> </ul>
<b>COMMENT/IMPACT</b>				

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
11	REGDOC 3.2.1, sections 2.2.3 'Public and media opinion'		The public information program describes media analysis.	Review media tracking documents and: <ul style="list-style-type: none"> <li>• confirm the media analysis describes the amount and nature of media coverage related to the facility or activity, and the media involved</li> <li>• confirm that only those concerns related to CNSC-licensed activities are considered.</li> <li>• confirm that the licensee has documents and records to demonstrate the management of media support/concerns</li> </ul>
<b>COMMENT/IMPACT</b>				



**2.4 PUBLIC INFORMATION STRATEGY AND PRODUCTS**

**Specific Instructions for this Section:** Request the public information strategy and 3-5 samples of related products.

**Compliant Finding:** The licensee was compliant with Public information strategy and products requirements of REGDOC 3.2.1, section 2.2.4.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
12	REGDOC 3.2.1, section 2.2.4 'Public information strategy and products'		Licensee to provide open and transparent means and access for the public to obtain information.	<ul style="list-style-type: none"> <li>• Confirm that the environmental risk assessment (ERA) is posted on licensee website (if conducted by licensee)</li> <li>• Confirm that the probabilistic safety assessment (PSA) is posted on the licensee website (if conducted by licensee)</li> <li>• Confirm that the information strategy and related products include the following:                             <ul style="list-style-type: none"> <li>○ information products that will be developed</li> <li>○ samples of the information products (if available) methods used to distribute the information</li> <li>○ how the information will address the perceived risk to health, safety and the environment of the licensed activity</li> <li>○ how specific target audiences will be reached</li> <li>○ how licensees and licence applicants will respond to and record comments, questions or concerns expressed by the target audiences</li> <li>○ timelines for releasing information, in accordance with the public disclosure protocol</li> </ul> </li> <li>• Verify that information is understandable and easily accessible</li> <li>• Confirm that the various communications vehicles used to share/gather information from stakeholders and ensure the variety meets the unique needs of target audiences</li> </ul>
<b>COMMENT/IMPACT</b>				

**2.5 PUBLIC DISCLOSURE PROTOCOL**

**Specific Instructions for this Section:** Request sample(s) of routine or non-routine situation, event or activity disclosed to public.

**Compliant Finding:** The licensee was compliant with the public disclosure protocol requirements of REGDOC 3.2.1, sections 2.2.5. and 2.3.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
13	REGDOC 3.2.1, section 2.2.5 'Public disclosure protocol'		Licensee has included a public disclosure protocol describing the information and the medium of disclosure with regard to information and reports of interest to the public.	Review protocol and verify there is a description of information and reports of public interest <ul style="list-style-type: none"> <li>• Items of interest to the public may include routine and non-routine situations, events and activities.</li> </ul>
<b>COMMENT/IMPACT</b>				
14	REGDOC 3.2.1, section 2.3.1 'Requirements of a public disclosure protocol'		Licensee has an established public disclosure protocol to address their target audiences' information interests in relation to the licensed activities.	Confirm the licensee describes: <ul style="list-style-type: none"> <li>• the type of information or reports to be made public</li> <li>• the criteria for determining when such information and reports are to be published</li> <li>• the medium of disclosure for such information and reports</li> <li>• review to ensure attempts made to be open and transparent in their relations with community representatives, target audiences and the public</li> </ul>

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
				Confirm: <ul style="list-style-type: none"> <li>• the licensee has consulted with public stakeholders and interest groups with a primary focus on the local community to determine what types of information would be of public interest.</li> <li>• disclosure protocol is available to the public</li> <li>• revisions of their public disclosure protocol indicate feedback received from members of the public, the changes and the reasons for the changes to the protocol</li> <li>• protocol contains instructions, criteria and requirements with respect to the timely disclosure of information known to be of interest to the target audience</li> </ul>
<b>COMMENT/IMPACT</b>				
15	REGDOC 3.2.1, section 2.3.2 'Guidance for a public disclosure protocol'		Open and transparent in relations with community representatives, target audiences and the public	Confirm licensee <ul style="list-style-type: none"> <li>• did seek to gain an understanding of what information the public wishes to know</li> <li>• has adhered to the communication strategies and products documented in their public information programs</li> </ul> Review disclosed information to verify: <ul style="list-style-type: none"> <li>• it does not release sensitive information</li> <li>• information links to public's perception of risk and CNSC's mandate</li> </ul>
<b>COMMENT/IMPACT</b>				

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
16	REGDOC 3.2.1, section 2.3.3. 'Public disclosure notification'		Licensee informs the CNSC of disclosures made under the public disclosure protocol at the time of, or before, such disclosure.	Confirm: <ul style="list-style-type: none"> <li>licensee has sent copies of disclosed public information to the CNSC point of contact with the subject title: PUBLIC DISCLOSURE</li> </ul>
<b>COMMENT/IMPACT</b>				

**2.6 CONTACT INFORMATION**

**Specific Instructions for this Section:**

- Request sample materials with point of contact information for each facility
- Review web content for point of contact information for each facility

**Compliant Finding:** The licensee was compliant with the point of contact and disclosure requirements of REGDOC 3.2.1, section 2.2.7.

ITEM #	REGULATORY REQUIREMENTS	LICENSEE REFERENCE	EXPECTED OUTPUTS	INSPECTION ACTIVITY
17	REGDOC 3.2.1, section 2.2.7 'Contact information'		The public information program shall define and provide contact information for the person(s) responsible for the program and its disclosure protocol.	Confirm point(s) of contact is (are) current and information is accurate for each facility.
<b>COMMENT/IMPACT</b>				