



Date: 2019-03-20  
File / dossier : 6.02.04  
Edocs pdf : 5864115

## **Update from CNSC Staff**

## **Mise à jour du personnel de la CCSN**

**Request to CNSC staff to report in future Regulatory Oversight Reports the total recordable injury frequency, including contractors data**

**Demande au personnel de la CCSN pour fournir dans les prochains Rapports de surveillance réglementaire les taux de fréquence global de blessures à déclaration obligatoire, incluant les données relatives aux entrepreneurs**

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Action item from November 8, 2018 Commission Meeting (#17560)

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Mesure de suivi de la réunion de la Commission du 8 novembre 2018 (#17560)

Commission Meeting

Réunion de la Commission

**May 15, 2019**

**Le 15 mai 2019**

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To M. Leblanc  
A c.c. G. Frappier, B. Gracie, M. Chirila

From S. Karkour  
De Director PRLCID

Security Classification – Classification de sécurité Unclassified	
e-Doc / ccm e-Doc 5808201	
Your File – Votre référence	
Date 2019-03-20	Tel. No. – N° de tél. 995-0272

**Subject Response to RIB Action 17560 to include contractor data as part of the TRIFR in 2018 NPGS ROR**

Paragraph 60 of the Minutes of the Canadian Nuclear Safety Commission (CNSC) Meeting Held on November 8, 2018 (e-Doc 5718133) noted that the Commission expects CNSC staff to report the total recordable injury frequency (TRIF) that included contractors data in future Regulatory Oversight Reports (ROR). The Secretariat subsequently raised Action # 17560 in the Regulatory Information Bank (RIB), providing the following instruction to the Directorate of Power Reactor Regulation (DPRR), which is identified as the contact:

During the November 2018 Commission Meeting, the Commission directed CNSC staff to include contractor data as part of the total recordable injury frequency rate (TRIFR) for the NGS sites in future NPP RORs, if TRIFR data is available from the licensee.

The Power Reactor Licensing and Compliance Integration Division is responding on behalf of DPRR, since our division is responsible for writing the 2018 ROR for nuclear power generating sites.

We would like to point out that the TRIF data, according to the definition from the Canadian Electricity Association (CEA), includes fatalities, lost time injuries, and medically treated injuries, as well as loss of consciousness, restricted work and first aid only injuries. The first three categories are included in the accident frequency rate calculations that the licensees are already required to report through REGDOC-3.1.1, *Reporting Requirements for Nuclear Power Plants, Version 2* (Safety Performance Indicator (SPI) #21). REGDOC-3.1.1 requires the licensees to report SPI#21 for employees, which include contractors and temporary staff, but do not include 3<sup>rd</sup> party contractors.

In our discussions with the licensees, it was reported that SPI #21 data for 3<sup>rd</sup> party contractors, which is not currently reported through REGDOC 3.1.1, is already available for the last five years (2013-2018) for all licensees.

However, our discussions with licensees also indicated that TRIF data for all employees and contractors (including 3<sup>rd</sup> party contractors) is only available for Darlington, Pickering and Point Lepreau NGSs, starting with 2018. Bruce Power is not a member of CEA and is not currently tracking TRIF data.

Given that Bruce Power TRIF data for 2018 is not available, we intend to provide SPI# 21 data, including data for 3<sup>rd</sup> party contractors, in the 2018 NPGS ROR.

We will continue discussions with the licensees to explore if Bruce Power can provide the TRIF data, going forward, according to the CEA definition. If so, and all licensees are willing to provide comparable data (e.g., they all include data for 3<sup>rd</sup> party contractors), we will consider including TRIF data in the 2019 NPGS ROR or 2020 NPGS ROR.

As a result of this request we will also consider updating the REGDOC 3.1.1 requirements for SPI# 21, to include the additional injuries statistics required to calculate TRIF.

Yours sincerely,

Suzanne Karkour, M. Eng., PMP

Director (Acting), Power Reactor Licensing and Compliance Integration Division