



**Written submission from
New Brunswick Power Corporation**

**Mémoire de la
Société d'Énergie du
Nouveau-Brunswick**

In the Matter of

À l'égard de

**Applications from Ontario Power
Generation, New Brunswick Power
Corporation and Bruce Power to amend
their nuclear power reactor operating
licences - REGDOC-2.2.3**

**Demandes d'Ontario Power Generation, de la
Société d'Énergie du Nouveau-Brunswick et de
Bruce Power concernant la modification de
leurs permis d'exploitation d'un réacteur de
puissance – REGDOC-2.2.3**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

March 2020

March 2020



Énergie NB Power

Point Lepreau Nuclear Generating Station
PO Box 600, Lepreau, NB
E5J 2S6

**TU 06374
PICA 19-5663**

October 11, 2019

Mr. Marc Leblanc, Commission Secretary
Secretariat
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

**Subject: Request for Amendment of the Point Lepreau Nuclear Generating Station
Power Reactor Operating Licence - PROL 17.00/2022**

The purpose of this letter is to request a licence amendment to the Point Lepreau Nuclear Generating Station (PLNGS) Power Reactor Operating Licence PROL 17.00/2022, in accordance with Section 24(2) of the Nuclear Safety and Control Act and Section 6 of the General Nuclear Safety and Control Regulations.

On September 24, 2019, the Commission superseded RD-204, "*Certification of Persons Working at Nuclear Power Plants*" with regulatory document, REGDOC-2.2.3, "*Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants*".

NB Power requests that the Commission amend Licence Condition 2.4 of the PLNGS PROL 17.00/2022 to replace the reference to RD-204 with its superseding regulatory document REGDOC-2.2.3. Attachment 1 includes a PLNGS proposal for amending licence condition 2.4 - in the PROL 17.00/2022 and LCH-PR-17.00/2022-R000, *Licence Conditions Handbook* (Certification Training and Examination Program).

PLNGS has a change management plan for the revision of our process requirements to align with REGDOC 2.2.3. This will occur within six months of the amendment. PLNGS will formally notify the CNSC upon successful completion of the plan.

If you require further information or clarification, please contact Krista Ward, Regulatory Affairs Manager at (506) 659-7514 or e-mail at KWard@nbpower.com.

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Sincerely,

Mark Power for B.P.

Brett Plummer

Vice President Nuclear and Chief Nuclear Officer

BP/KW/sd

cc: Louise Levert, John Burta, Interventions, Bruno Romanelli, Isabelle Gingras, Josée Giguère, Nathan Kline, Aya El-Merhi, Cynthia Bechara (CNSC - Ottawa)
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Mark Power, Chris Wilson, Mike Fairweather, Jason Nouwens, Krista Ward, Scott Demmons, Carol Murray, Amanda Gardner (NBP)

Attachment 1: Proposed Amendment to Power Reactor Operating Licence PROL 17.00/2022

Current Wording of PLNGS PROL 17.00/2022, Licence Condition 2.4:

The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document RD-204 Certification of Persons Working at Nuclear Power Plants.

Persons appointed to the following positions require certification:

- (i) Senior Health Physicist;
- (ii) Shift Supervisor; and
- (iii) Control Room Operator.

NB Power proposes the following changes:

The licensee shall implement and maintain certification programs in accordance with CNSC Regulatory document REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants.

Persons appointed to the following positions require certification:

- (i) Senior Health Physicist;
- (ii) Shift Supervisor; and
- (iii) Control Room Operator.