



**Written submission from
Bruce Power**

**Mémoire de
Bruce Power**

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

November 11, 2019

NK21-CORR-00531-15378
NK29-CORR-00531-16213

Mr. M. Leblanc
Commission Secretary
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

Request for Amendment of the Nuclear Power Reactor Operating
Licence Bruce Nuclear Generating Stations A and B – PROL 18.00/2028

The purpose of this letter is to request a licence amendment to the Nuclear Power Reactor Operating Licence Bruce Nuclear Generating Stations A and B PROL 18.00/2028, 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On September 24, 2019, the Commission superseded RD-204, *“Certification of Persons Working at Nuclear Power Plants”* with regulatory document, REGDOC-2.2.3, *“Personnel Certification, Volume III: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”*.

Bruce Power requests the Commission amend Licence Condition 2.4 of the PROL 18.00/2028 to replace the reference to RD-204 with its superseding regulatory document REGDOC-2.2.3. Attachment A includes the application to amend the PROL 18.00/2028. Attachment B includes a Bruce Power proposal for amending licence condition 2.4 in the PROL 18.00/2028 and LCH-PR-18.00/2028-R001, *“Licence Condition Handbook”*. Attachment C provides information pursuant to Section 6 *“Application for Amendment, Revocation or Replacement of Licence”* of the General Nuclear Safety and Control Regulations.

The following five (5) Bruce Power documents will require updates to reflect changes made in REGDOC-2.2.3

- TQD-00012, *“Bruce A And Bruce B Authorized Nuclear Operator Initial Training - Training And Qualifications Description”*
- TQD-00013, *“Bruce A And Bruce B Control Room Shift Supervisor/ Shift Manager Training And Qualifications Description”*
- TQD-00014, *“Certified Staff Continuing Training and Re-Certification Testing- Training and Qualifications Description”*



- TQD-00015, "*Bruce A And Bruce B Certified Unit 0 Control Room Operator Initial Training And Qualification Description*"
- TQD-00075, "*Health Physicist - Authorized Health Physicist*"

Bruce Power will initiate a regulatory action to revise the above five (5) governing documents to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel within six (6) months after the PROL 18.00/2028 is amended.

If you require further information or have any questions regarding this submission, please contact Heather Kleb, Department Manager, Operations Regulatory Affairs, at (519) 361-2673 extension 17079, or Heather.Kleb@brucepower.com.

Yours truly,

A handwritten signature in black ink, appearing to read 'Maury Burton', written over a horizontal line.

Maury Burton
Senior Director, Regulatory Affairs
Bruce Power

cc: CNSC Bruce Site Office
L. Sigouin – CNSC, Ottawa

Attach.

Attachment A

**Application to Amend Nuclear Power Reactor Operating Licence Bruce Nuclear
Generating Stations A and B PROL 18.00/2028**

Attachment A
**Application to Amend Nuclear Power Reactor Operating Licence Bruce Nuclear
Generating Stations A and B PROL 18.00/2028**

LEGAL APPLICANT AUTHORITY

Mr. Dr. Mrs. Ms.

Name: Clewett, Leonard Keith
Surname, Given name, Middle name

Title: Chief Nuclear Officer and Executive Vice President

Telephone: 519-361-2673 ext.13478

Email: len.clewett@brucepower.com

Applicant: Bruce Power Inc.

Address: PO Box 1540
Building B10, 177 Tie Road
Municipality of Kincardine,
Tiverton, ON
N0G 2T0

I, LEN CLEWETT have been designated by Bruce Power (Reference A1) as having signing authority for this application, pursuant to the General Nuclear Safety and Control Regulations Section 15(b), and certify that all information submitted herein is true and correct to the best of my knowledge. I understand that all statements and representations made in this application and on supplementary documentation are binding on the applicant.

Signature: 

Date: 2019/11/08
YYYY/MM/DD

Attachment B

Proposed Amendment to Power Reactor Operating Licence PROL 18.00/2028

**Attachment B:
Proposed Amendment to Power Reactor Operating Licence PROL 18.00/2028**

Current Wording of PROL 18.00/2028, 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) authorized health physicist;
- (ii) authorized nuclear operator;
- (iii) control room shift supervisor;
- (iv) Unit 0 control room operator; and
- (v) shift manager.

Bruce 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) authorized health physicist;
- (ii) authorized nuclear operator;
- (iii) control room shift supervisor;
- (iv) Unit 0 control room operator; and
- (v) shift manager

Attachment C

**Information Required for Amendment of a Licence Pursuant to Section 6 of the
General Nuclear Safety and Control Regulations**

**Attachment C:
Information Required for Amendment of a Licence Pursuant to Section 6 of the
General Nuclear Safety and Control Regulations**

Section 6 of "General Nuclear Safety and Control Regulations"	Applicant Information
<p>6. An application for the amendment, revocation or replacement of a licence shall contain the following information:</p>	
<p>(a) a description of the amendment, revocation or replacement and of the measures that will be taken and the methods and procedures that will be used to implement it;</p>	<p>The amendment is to replace 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". The Commission superseded RD-204 with REGDOC-2.3.3 on September 24, 2019</p> <p>Following amendment of Nuclear Power Reactor Operating Licence Bruce Nuclear Generating Stations A and B PROL 18.00/2028, Bruce Power will revise the following applicable governance to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel:</p> <ul style="list-style-type: none"> • TQD-00012, "Bruce A And Bruce B Authorized Nuclear Operator Initial Training - Training And Qualifications Description" • TQD-00013, "Bruce A And Bruce B Control Room Shift Supervisor/ Shift Manager Training And Qualifications Description" • TQD-00014, "Certified Staff Continuing Training and Re-Certification Testing- Training and Qualifications Description" • TQD-00015, "Bruce A And Bruce B Certified Unit 0 Control Room Operator Initial Training And Qualification Description" • TQD-00075, "Health Physicist - Authorized Health Physicist"
<p>(b) a statement identifying the changes in the information contained in the most recent application for the licence</p>	<p>There is no change to any of the information contained in the most recent application for the Bruce Power PROL 18.00/2028.</p>

<p><i>(c) a description of the nuclear substances, land, areas, buildings, structures, components, equipment and systems that will be affected by the amendment, revocation or replacement and of the manner in which they will be affected; and</i></p>	<p>Not applicable. This request is only applicable to the authorization training programs.</p>
<p><i>(d) the proposed starting date and the expected completion date of any modification encompassed by the application.</i></p>	<p>Bruce Power will initiate a regulatory action to revise this governance to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel within six (6) months after the PROL 18.00/2028 is amended</p>