



**Written submission from
Ontario Power Generation Inc. –
Pickering**

**Mémoire de
Ontario Power Generation Inc. –
Pickering**

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 13, 2019

CD# P-CORR-00531-05831

MR. M. LEBLANC
Commission Secretary

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

Pickering NGS – Application for Amendment of the Pickering Nuclear Generating Station Power Reactor Operating Licence PROL 48.00/2028

The purpose of this letter is to request the Canadian Nuclear Safety Commission (the Commission) to amend Licence Condition 2.4 of the Pickering NGS Power Reactor Operating Licence, PROL 48.00/2028. This submission is pursuant to 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On September 24, 2019, the Commission superseded RD-204, *Certification of Persons Working at Nuclear Power Plants* with regulatory document, REGDOC-2.2.3, *Personnel Certification, Volume III: Certification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*.

OPG requests the Commission to amend Licence Condition 2.4 of the Pickering NGS PROL 48.00/2028 to replace reference to RD-204 with its superseding regulatory document REGDOC-2.2.3.

Attachment 1 provides the proposed amendment to Licence Condition 2.4 of Pickering's PROL 48.00/2028.

Attachment 2 provides information pertaining to Section 6, of Application for Amendment, Revocation or Replacement of Licence of the General Nuclear Safety and Control Regulations.

The following five OPG documents will require updates to reflect changes made in REGDOC-2.2.3:

- N-TQD-101-00001, Authorized Nuclear Operator Initial Training and Qualification Description,

- N-TQD-102-00001, Nuclear Shift Manager/Control Room Shift Supervisor Initiation Training and Qualification Description,
- N-TQD-103-00001, Nuclear Certified Personnel Continuing Training And Qualification Description,
- N-TQD-105-00001, Darlington Unit 0 Control Room Operator (CRO) Initial Training and Qualification Description, and
- N-TQD-443-00001, Radiation Protection Training And Qualification.

OPG will initiate a Regulatory Obligation Action Request (REGO), as committed to in Reference 1, to revise this governance to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel within six (6) months after the Darlington and Pickering NGS PROLs are amended, as specified in Attachment 3.

OPG requests amendment of the Pickering NGS PROL 48.00/2028, as outlined in Attachment 1, at your earliest convenience, and a subsequent update of LCH-PR-48.00/2028-R002, Licence Conditions Handbook.

If you have any questions, please contact Ricky Aroda - Acting Manager, Pickering Regulatory Affairs, at extension 7067.

Sincerely,



R. LOCKWOOD
FOR.

Randy B. Lockwood
Senior Vice President
Pickering Nuclear

cc: CNSC Pickering Regulatory Program Division (copy to each staff)
CNSC Records Office (cnscc.licensee-titulaires.ccsn@canada.ca)

Reference:

1. OPG letter, S. Gregoris to M. Leblanc, "Darlington NGS - Application for Amendment of the Darlington Nuclear Generating Station Power Reactor Operating Licence 13.01/2025", October 1, 2019, CD# NK38-CORR-00531-21080.

Attachments:

1. Proposed Amendment to Licence Condition 2.4 of Pickering NGS PROL 48.00/2028.
2. Information Required for Amendment of a Licence Pursuant to Section 6 of the General Nuclear Safety and Control Regulations.
3. Summary of Regulatory Commitments and Regulatory Management Actions Undertaken in this Submission.

ATTACHMENT 1

Proposed Amendment to Licence Condition 2.4 of Pickering NGS PROL 48.00/2028

Current Wording of Pickering NGS PROL 48.00/2028, 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) Responsible Health Physicist;
- (ii) Shift Manager;
- (iii) Control Room Shift Supervisor; and
- (iv) Authorized Nuclear Operator.

OPG Requested Wording to Amend Pickering NGS PROL 48.00/2028, Licence Condition 2.4 (**Changes are bolded and underlined**)

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) Responsible Health Physicist;
- (ii) Shift Manager;
- (iii) Control Room Shift Supervisor; and
- (iv) Authorized Nuclear Operator.

ATTACHMENT 2

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 Regulation"	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 purpose of this letter is to request the Canadian Nuclear Safety Commission (the Commission) to amend Licence Condition 2.4 of the Pickering NGS Power Reactor Operating Licence, PROL 48.00/2028. This submission is pursuant to Section 24(2) of the Nuclear Safety and Control Act and Section 6 of the General Nuclear Safety and Control Regulations.</p> <p>The amendment is to replace RD-204, Certification of Persons Working at Nuclear Power Plants with its superseding 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-2.2.3 on September 24, 2019.</p> <p>Following the amendment of Pickering NGS PROL 48.00/2028, OPG 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"> • N-TQD-101-00001, Authorized Nuclear Operator Initial Training and Qualification Description, • N-TQD-102-00001, Nuclear Shift Manager/Control Room Shift Supervisor Initial Training and Qualification Description,

Attachment 2 (Page 2 of 2) to OPG letter R. Lockwood to M. Leblanc, "Pickering NGS – Application for Amendment of the Pickering Nuclear Generating Station Power Reactor Operating Licence 48.00/2028", CD# P-CORR-00531-05831

	<ul style="list-style-type: none"> • N-TQD-103-00001, Nuclear Certified Personnel Continuing Training And Qualification Description, • N-TQD-105-00001, Darlington Unit 0 Control Room Operator (CRO) Initial Training and Qualification Description, and • N-TQD-443-00001, Radiation Protection Training and Qualification.
<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 Pickering NGS licence or subsequent amendment requests (Reference A2-1).</p>
<p>(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</p>	<p>Not applicable. This change is applicable only to the authorization training programs.</p>
<p>(d) the proposed starting date and the expected completion date of any modification encompassed by the application.</p>	<p>OPG will initiate a Regulatory Obligation Action Request (REGO) to revise the governance listed above in section 6(a) to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel within six (6) months after the Darlington and Pickering NGS PROLs are amended.</p>

Reference:

- A2-1 OPG Letter, R. Lockwood to M. Leblanc, "Application for Renewal of the Pickering Nuclear Generating Station Power Reactor Operating Licence", August 28, 2017, CD# P-CORR-00531-05055.

Attachment 3 (Page 1 of 1) to OPG letter R. Lockwood to M. Leblanc, "Pickering NGS – Application for Amendment of the Pickering Nuclear Generating Station Power Reactor Operating Licence 48.00/2028", CD# P-CORR-00531-05831

ATTACHMENT 3

Summary of Regulatory Commitments, Regulatory Obligations and Regulatory Management Actions Undertaken in this Submission

Regulatory Commitments (REGC):

No.	Description	Due Date
	None	

Regulatory Management Action (REGM):

No.	Description	Due Date
	None	

Regulatory Obligation Action (REGO):

No.	Description	Due Date
1.	Revise N-TQD-101-00001, N-TQD-102-00001, N-TQD-103-00001, N-TQD-105-00001 and N-TQD-443-00001 to reflect the REGDOC-2.2.3 requirements for certification of nuclear power plant personnel.	Six (6) months after PROL amended.