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**Written submission from
Gordon Dalzell**

**Mémoire de
Gordon Dalzell**

Regulatory Oversight Report for
Canadian Nuclear Power Generating
Sites: 2022 and Mid-term update for
Ontario Power Generation's Pickering
Nuclear Generating Station

Rapport de surveillance réglementaire
des sites de centrales nucléaires au
Canada : 2022 et Rapport de mi-parcours
d'Ontario Power Generation pour la
centrale nucléaire de Pickering

Commission Meeting

Réunion de la Commission

December 13 and 14, 2023

13 et 14 décembre 2023

Gordon W. Dalzell

October 30, 2023

Canadian Nuclear Safety Commission
P.O. 1046, Station B
280 Slater Street
Ottawa, Ontario, K1P 5S9
Canada

To Whom It May Concern:

**SUBJECT: Regulatory Oversight Report for Canadian Nuclear Power
Generating Sites: 2022**

This letter is to provide my comments and recommendations on the review of the Regulatory Oversight Report Canadian Nuclear Power Generating Sites 2022

Please keep in mind that these comments and responses to the many topic areas are prepared from a community member's perspective and in this case an interested party involved in the environmental movement who follows the nuclear energy issues.

The points raised in my submission of a critical nature, are raised to assist the regulator to continue its oversight vigilance and transparency. This ROR does raise questions where answers are not always easy for the public to understand. I continue to have the outmost confidence in the oversight work of the Canadian Nuclear Safety Commission members and staff. Even with all the issues raised in my submission, it does not preclude my fundamental conclusion that all these nuclear power plants in Canada are safe and the public is not at risk from them.

I trust that the points raised in my submission will be discussed with both CNSC staff and Commission Board members. I would also appreciate a written response to the point raised in my submission. The nuclear technology is a very complex science, and as a community member do stand to be corrected if my interpretation of the information highlighted in submission needs clarification to assist the public in this review.

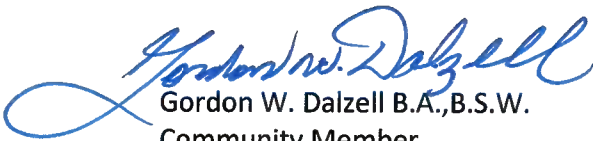
Background information of commentator:

This writer has been following the local nuclear industry over the years specifically the Point Lepreau Nuclear Generating Station (PLNGS). My past involvement has included formal intervenor status at the licensing renewal for this facility (PLNGS).

Additionally, I have participated in the public review of Oversight Report of Nuclear Facilities in Canada by making a written submission to the general meeting of the CNSC for several years. As well, this writer is co-founder of the Saint John Citizens Coalition for Clean Air an environmental public interest group advocating for clean air in our local and regional area of Saint John, NB.

I appreciate the opportunity to participate, and I thank you for taking my comments under review.

Respectfully submitted,



Gordon W. Dalzell B.A., B.S.W.

Community Member

Saint John, New Brunswick

Submission on the Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2022

Submitted by: Gordon W. Dalzell, BA., B.S.W.

Introduction

This community member has reviewed this report on an annual basis for the last three or four years. Again, this year such a review has been completed for the 2022-year period.

This submission will be more of a highlight of issues of concern, changes in the report itself, positive and negative reactions, reading the report, as well as questions raise that this writer anticipates the CNSC Commission will raise at the December meeting for both the operators as well as the CNSC staff attention and response.

Time restraints based on the time and effort of this writer, reviewing the comprehensive Environment Impact Assessment Registration documents for the small modular reactor project, limits amount of time available to provide as comprehensive submission on the 2022 ROR as completed in the past years.

The deadline for public comment is fast approaching for both this ROR and the NB Comprehensive Environmental Impact Assessment public comments period for the SMR Project.

Reading just a summary of this report, one might come to the conclusion that there is no point of reading the entire report. That would be a mistake, despite the conclusions in the summary by CNSC staff, “that the nuclear power plants and the waste management

facilities on their sites in Canada Operate it safely”. There were still many issues and questions that arose in the reviewer’s mind.

While carefully reading this report that relate to potential safety issues of concern. Many relates to the degree of compliance to the regulated CNNC safety standards and practices.

A good example of the point this review wants to illustrate is found in Section 3.5.0 which covers the Bruce Nuclear Power Station specifically on page 91 under the heading Event Initial

Event Initial Reports

There were two event initial reports (EIRs) pertaining to the BNGS A and B submitted to the Commission for the reporting period between January 1, 2022, to December 31, 2022:

1. CMD 22-M16, Elevated Hydrogen equivalent concentration (Heq) in the inlet rolled joint (IRJ) of a Bruce pressure tube (PT) removed from service; see Appendix I for more details.
2. CMD 22-M28, Bruce B Unit 6, Major Component Replacement, Inadequate control of quarantined items; see details below.

With respect to CMD 22-M28, Bruce Power was made aware of suspected items supplied for Unit 6 fuel channels on July 25, 2022. Bruce Power submitted a preliminary report on August 3, 2022, to notify CNSC staff of suspect material used in several end fittings. At the time of reporting, six of the end fittings impacted by the suspect material had been installed.

On August 16, 2022, Bruce Power notified CNSC staff that an additional suspect end fitting had been installed and a second suspect end fitting had been incorporated within a sub-assembly.

On August 22, 2022, CNSC staff conducted a reactive field inspection and observed that there was no physical segregation of the suspect end fittings carried out by Bruce Power as required. Discussions with Bruce Power staff revealed that a decision was made by Bruce Power to not segregate the suspect end fittings.

On August 23, 2022, CNSC staff requested Bruce Power to stop work on all fuel channel installation activities as a result of this deliberate non-compliance.

CNSC staff continue to follow-up with Bruce Power on this issue with the focus on causes and corrective actions surrounding the supply chain process.

What is disconcerting and worrisome to this community member is the line that reads “on August 23, 2022, CNSC staff requested Bruce power to start work on all fuel channel installation activities as a result of this deliberate non-compliance.”

Over the years, reviewing those Regulatory Oversight Reports, this writer, thankfully rarely sees example of deliberate noncompliance by a licensee.

Thankfully, the CNSC staff who oversees the safety of these nuclear generating sites, took appropriate and necessary actions, which was as follows:

Page 95 - “on September 1, 2022, Bruce power was issued an administrative monetary penalty of \$24,760 for improperly segregating suspect end fittings.”

This writer commands the CNSC for applying such a penalty after such a deliberate, noncompliance decision on this licensee part.

The CNSC staff need to use such penalties when warranted such as this case noted on page 95. Over the years, this writer has identified that such enforcement action needed to be used more frequently, considering non-compliance for safety standards will not be tolerated, considering these are nuclear power plants close to areas where millions of people reside.

It has to be kept in mind that these facilities are not pulp and paper plants but nuclear power facilities and sites where there is no compromising on safe operating practices and regulated rules.

One could only manage that if there was not the rigorous regulatory oversight by CNSC with equally tough regulations what could occur?

3.5 Bruce Nuclear Generating Station

3.5.2. - this review took note that “in 2022, Bruce Power reported three events below minimum compliment at Bruce Nuclear Generating Station A and B due to sudden staff sickness and family emergency and expired certification qualifications.”

This raises the question as to whether sufficient backup personal was readily available under their human performance management program as per the appropriate REGDODC.

There is no excuse for the last circumstances stated as “expired certification qualifications.” Such circumstance does not occur on an immediate basis, but there is usually lead up time for such expiration.

Someone failed to take notice that an employee’s certifications were at about to expired. This was preventable if someone had been checking dates.

These various non compliances described having low safety significance, nevertheless occurred. Good to see, as one would expect that Bruce Power took prompt corrective actions to address these non compliance. The question is – were the actions taken effective?

This section needed to provide information on whether there were any more reoccurrences or noncompliance. The December meeting needs to provide an update from CNSC staff for the commissioners.

3.5.5. Physical Design

In this section, Bruce Power as developed a corrective action plan for identified non-compliance under this section on their dissection. They are in progress at the time of this ROR and will be submitted to the CNSC staff for review. At the December meeting, the commissioners need to be provided with updates, not only on these action plans, but many others identified in this Regulatory Oversight Report.

CNSC need to produce a master spreadsheet with all the identified non-compliance action plans to address for each and every nuclear power generation facility and sites.

Such a progress report should be included as an Appendix in future are all our meetings. For this December meeting, such as summary should be presented to the commissioners.

3.5.6. - Fitness for Duty

Despite the following statement, “CNSC staff concluded that Bruce Power met the applicable regulatory requirements and expectation of CNSC staff for the fitness for service SCA in 2022”. It is the next part of the sentence that states “with the exception of some pressure tubes in extended operation with regions of potentially elevated hydrogen equivalent concentrations near the inlet rolled joint.” that causes this writer to be worried, considering the critical importance of these pressure tubes for the safe operation of this nuclear reactor.

One hesitates to use the analogy of playing Russian Roulette for lack of a better analogy, but it appears that this licensee is taking chances are playing the odds that their analysis will not be a problem. If this was a steel plant or a pulp mill, one might be able to accept such potential associated risks with the elevated hydrogen equivalent concentration near outlet rolled joints but a Nuclear Power Plant?

This methodology to determine thinning of these pressure tubes are there for a purpose and any indicator that might indicate some thinning, indeed, a significant concern to this community member reviewing this 2022 Regulatory Oversight Report.

3.5.7. Radiation Protection

It is noteworthy that there were no unplanned exposure events that resulted in exceedances of the action levels at Bruce Nuclear Generating Station A and B.

This statement in this section does not state that there were not any. The question is, how many exceedances did occur?

3.5.9 Environmental Protection

Reassuring to read the following “environmental releases from Bruce A & B were well below the DRLs and no radiological releases exceeded regulatory limits”.

Having read that statement, it raises a number of questions and observations that include the following:

A. What are the specific kind of radiological releases? Is it just tritium or others? These specific names of these releases should have been identified since this is a public report. The public have a right to know what the various releases are. This writer may have missed the information in the included list of various reports.

B. There were radiological releases that did take place, it is just that those releases did not exceed regulatory limits.

C. There is no mention where these releases ended up such as people’s breathing them in or on food sources, water source, reservoirs? What about cumulative effect? Do these releases state in the natural environment? The ROR as a public document needs to provide more specific information on the releases from these sites. These types of questions need to be added in the ROR.

The public need more than reassuring, blanket statement, such as no radiological releases, exceeded regulatory limits.

3.7. Point Lepreau Nuclear Generating Station

This writer resides at approximately 50 km from this facility and over the years have taken an interest in its operation in addition to the other nuclear power plants included in the

CNSC Regulatory Oversight Report currently open for public review prior to the December 2023 public meeting.

Further, this writer participated as an intervenor by way of a written submission at NB Power, license renewal for PLNGS, as reference on page 113 under licensing.

Fisheries Act Authorization

This ROR simply makes a one sentence acknowledgement that such authorization was granted. In the past RORs for this Station, there was much more coverage on this subject area. For details, refer to the 2021ROR. This report needed to provide an update from past years on issues raised by intervenors at a minimum, a digital reference needed to be included, so that interested parties could access up-to-date details on this DFO Fisheries Act Authorization.

Event Initial Report

Last paragraph states on page 114 “the detailed event report was submitted to the Canadian Nuclear Safety Commission staff on May 29, 2023, and was undergoing its review as of June 2023.

This reviewer recommends that CNSC staff update the members of its commission on this matter at the December 2023, hearing where the public can obtain an update as this was an important event at this site.

3.7.1 Management System

In reference to the line in the section that reads “CNSC staff will continue to monitor and the power implementation and corrective actions”.

An update on this licensee's corrective actions needs to be submitted to the commission at the December 2023 meeting on the ROR.

One area of the section under human performance management referred to the cyber security type inspection (GPLRPD-2022-09793) identified one noncompliance finding of medium safety significance under personnel training area.

The rating of medium safety significance caught this writer's attention as so many of these significance descriptions are usually in the low significance category.

This is one type of inspection that one would want to see no non-compliance designations considering that cyber security has been identified by CNSC as a potential threat, as noted in a past review of cyber security at all these nuclear power plants.

In reference to the CNSC staff's assessment in May 2022, NB Power's implementation on their multiple-choice question methodology was found to be adequate. This reviewer questioned this methodology in last year written, ROR submission, as the licensing renewal public review hearing for the Point Lepreau Nuclear Generating Station. This writer is not convinced that such a methodology is rigorous enough based on the many years using such a testing method at university.

It is my understanding that CNSC, when approving such a methodology, will review after one year of implementation. Report on the results of this use needs to be presented to the December 2023 meeting of the Canadian Nuclear Safety Commission. The use of the word adequate is not a ringing endorsement in such a critically important component for the area for the area of general certification, examination testing of employees.

There are so many reasons why this writer continues to have full confidence in the CNSC oversight, and inspection mandate for all the Canadian nuclear plants. One of so many is found in Section 3.7.5 physical design in the Point Lepreau Nuclear Generating Station. This is when CNSC staff concluded a type two environmental qualification inspection found in the last paragraph in 3.7.5. This writer was pleased to see NB Power was found to be in compliance with the regulatory requirements. Although, the one non-compliant finding was of the low safety significance, the fact that such one non-compliance was found in this inspection, reassures a community member like this writer, that this, and all the others nuclear power plants in Canada are very carefully inspected.

3.7.6. - Fitness for Service

One area of concern noted in the first sentence of this section caused this reviewer concern. It reads. "All special safety systems met reliability targets, except for emergency, core cooling and containment. ECC experienced on availability during shut down conditions."

From a non-technical average community member perspective reading, it creates potential images of some kind of potential melt down related to some kind of problem for emergency core cooling and containment conditions. Everyone generally knows that you don't want the core of a nuclear power plant heating beyond its established safe parameters. It is noted in this first paragraph that this unavailability conditions took place during an outage condition when the decay heat was low. Great care has to be taken when describing these events to assure the general public is not unnecessary alarmed.

This described event may not have been a big deal but reading it without a careful reassurance from the CNSC on safety implications could cause community members to misunderstand the potential implications. More information to reassure the public needed

to be powered in Section 3.7.6. There are certain words in the nuclear power plant operations that can rigger unnecessary fear and anxiety.

3.7.9 Environmental Protection

It was reassuring to read that these were no environmental exceedance or spills at PLNGS in 2022. Further 3.7.9 states:

“The assessed dose to the public from PLNGS site (0.0011 mSv) remained well below the regulatory limit of 1 mSv/year.”

This is what one would want to read for all the Canadian Nuclear Power plants.

3.7.12 Security

Despite that one non-compliance noted above in the area of cyber security this writer is reassured to learn that “CNSC staff concluded that NB Power met the applicable regulatory requirement and CNSC expectation for the Security SCA at PLNGS in 2022.” Was this a general failure of security protocol or a documentation issue? The ROR did not clarify this on Page 60.

Section 3.1 Darlington Nuclear Generating Station

In reviewing the section of Darlington, there were several issues that alarmed this reviewer specifically 3.1.12 Security that jumped out when reading what the CNSC reports in this 2022 ROR for this licensee.

What could be of more critical importance that security for a nuclear power plant.

The first sentence under this heading is not all comforting. It states on page 60 - "CNSC staff concluded that OPG did not meet all the regulatory requirements for the SCA Security at the DNGS in 2022."

Reading the next paragraph where security inspections conducted in 2022 resulted in 13 non-compliance findings spanning across multiple specific areas. Additionally, there were instance where nuclear security officers (NSOs) did not meet the qualification requirements outlined in REGDOC 2.2.4.

Again, it gets worse from a security lapse perspective. The ROR states further "Furthermore, security measures were not fully in place for all the pathways at site as mandated by RD-321, Criteria for Physical Protection Systems and Devices at High Security Sites."

This is a shocking lapse of regulated security measures in these areas reported in Section. 3.1 .12. These security lapses left this site vulnerable to a security breach that potentially could have had frightening consequences if bad actors with malicious intent to tried to interfere with the safe operation of this nuclear power plant.

Those responsible need to be held responsible for allowing this nuclear power plant to be placed at risk. As expected, thankfully OPG promptly took corrective address to dress the findings identified during the inspections conducted in 2022.

As well, CNSC staff increased regulatory scrutiny in the area due to non-compliances observed in 2021 and 2022.

Good to see CNSC issued an administrative monetary penalty to OPG as a result of a failure to comply with a licence condition in relation to its security program at the Pickering and Darlington Nuclear Generating Station.

Without all the details, this writer does not share CNSC statement. "It is important to note that based on the assessment conducted, there is no immediate risk to safety and security. More information would be helpful.

It is interesting to note that CNSC does not state that there was no potential for risk of security to this nuclear power plant. In my view, there was real and potential risk to safety and security.

3.3 Pickering Nuclear Generating Station

The following commentary is provided after carefully reviewing this section.

Under licensing, it is noted the Commission renewed the PROL for a 10-year period covering September 2018 to August 31, 2028, with three phases as noted under licensing.

Most notable is that continued commercial operation is until December 31, 2024. This writer in last years ROR commentary expressed concern whether this nuclear generating station can be safely operated, as it is in the last period of operation based on the age of this power plant facility. It is noted that a public commission hearing to considering extensions to this operation was expected to be held in June 2024, considering the age of this facility authorizing an extension is worrisome to this commentator.

The Periodic Safety Review reassessment hopefully will provide important information for decision maker to rule on any such extensions. This writer recommends the CNSC staff

provide the Commission and the public with a complete update on the state of this nuclear plant in regard to safety prior to any operating extensions.

Such an update is recommended for December 2023 hearing on their ROR in Section 3.3.4 Safety Analysis. There were a number of issues identified by CNSC that resulted in assessments including seismological consultations review with experts from NRCAN. At the end of 2022, their review was still in progress. This writer would like to see the results of this review presented to the Commissioners at the December 2023 Hearing on this ROR.

3.3.5 Physical Design

OPG submitted quarterly pressure boundary reports in a timely manner which CNSC staff reviewed and found to be compliant with reporting requirements. Question is what do those reports conclude on the pressure tubes for this old facility? This ROR needed to provide an update. This needs to be done at the December 2023 Hearing.

3.3.12 Security – page 49

Again, the ROR reports a second lapse in security SCA requirements at a second nuclear generating station. This time at Pickering Nuclear Generating Station (PNGS) is reported in 2022 in the Regulatory Oversight Report.

As a community member, where millions of people live within the region, including this writer's grandchildren - it is most worrisome to read Section 3.3.12 Security for a Pickering Nuclear Generating Station (PNGS).

Specifically, CNSC staff concluded that "OPG did not meet all the applicable regulatory requirement for the SCA security at PNGS in 2022."

The ROR states in Section 3.3.12 Security, the following statement which is a serious concern of this community member. It states ““CNSC staff concluded that OPG did not meet all the applicable regulatory requirements for SCA Security at Pickering Nuclear Generating Station in 2022. There were four non-compliant findings happening across multiple specific areas.”

The issue of the number of nuclear security officers required for the minimum shift complement was identified. Worse still based on the findings at the Darlington Nuclear Generating Station for Nuclear Security Officers not meeting the qualification requirement of REGDOC 2.2.4 at the required frequency.

Further matters on cyber security program were identified during an inspection. This is not the only year where security issues were raised. In 2021, an action item was identified within facilities and equipment that indicated that OPG performance significantly deviated from the applicable requirements, and CNSC staff expectation. One might conclude that such regulatory rules and standards are discretionary, but that is not the case. These REGDOCs are legally binding, and there is no excuse for OPG failing to follow this important safety regulations.

The writer supports CNSC issuing an administrative monetary penalty to OPG as a result of a failure to comply with a license condition in relation to its security program at the Pickering and Darlington Nuclear Generating Stations.

The Administrative Monetary Penalty (AMP) issued for the rule’s facility was not tough enough at \$24,000.

These AMPs need to be set much higher to send a stronger message that those serious non compliance will not be accepted or tolerated. CNSC staff need to provide the December 2023 hearing with detailed updates to reassure the public that licensees will not be

accepted with security lapses. Thankfully CNSC is there to provide oversight to ensure compliance.

The findings in the Executive Summary of the ROR, despite the fact this writer, highlighted important non-compliances, especially in the area of Security, lapses at the Darlington Nuclear Generating Station and Pickering Nuclear Generating Station were reassuring and what the public expect to hear from their federal regulator.

These key points are noted in that Executive Summary.

CNSC staff concluded that “the NPPs and WMFs operated safely in 2022. No serious process. Failures occurred at the nuclear power plants.”

“Radiation dose to the public and to the workers at the nuclear power plants and waste management facilities were below the regulatory limits.”

The frequency and severity of non-radiological injuries to workers were low.

“Radiological releases to the environment from the nuclear power plants and waste management facility will be at all regulatory limits.”

“Licenses meet the applicable requirements related to Canada ‘s international obligations, safeguards inspection results were acceptable to the International Atomic Energy Agency (IAEA).”

These CNSC statements on page 12 are the key take away messages that this reviewer wants to emphasize having carefully read the entire regulatory oversight report.

1.1 About the Regulatory Oversight Report

This writer acknowledges the improvements worthy of note in this section. This writer was very pleased to see this report included information requested by the commission from previous regulatory oversight, reports and licensing hearings (page 2 last paragraph).

Table 1 - Page 3

Details of CNSC Regulatory Information Rank system. What struck this reviewer in Table 1, was 26782 update the commission on the concerns, raised by several interveners, whose comments and recommendations made on previous RORs were not addressed by CNSC staff. The Commission directed CNSC staff to work towards the transparent resolution of intervenors recommendations. This level of public transparency and accountability was most encouraging and in the public interest.

1.4

CNSC regulates the nuclear sector in Canada, including WPP and WMF through licensing, reporting, compliance verification, and enforcement.

The enforcement part of CNSC mandate historically has been weak in this writer's review. This year's ROR reports on enforcement, action administrative penalties, which this writer concludes, were warranted based on those non compliances cited in the 2022 ROR.

This whole area needs to be strengthened made tougher to get the message to licensees that significant noncompliance to REGDOCs will not be accepted. The penalties need to be higher.

This kind of enforcement action is a topic this intervenor as raised in past written submissions.

1.4.2 Licensing

This section did not mention the commissions decision of a fall mid-licensee review for the Point Lepreau Nuclear Generating Station that includes a public hearing process. They should have been included in 1.4.2

Table 3

Total number of each type of inspection and findings per NPP.

Regarding the Point Lepreau Nuclear Generating Station, there were 99 field inspections. This number is higher than for the other nuclear power plants. Question is why? An explanation needs to be provided to the commissioners at the December public meeting. This number leaves the public wondering what the reason was. Is that because there are less inspectors at the other sites? If that is the case, why?

Table 4

Number of available certified positions for NPP and certified positions for 2022.

This writer was reassured by the numbers provided for PLNGS. As well as the other and NPPs.

RE: random alcohol and drug testing

Page 15 - it is noted that on June 6, 2023, the Federal Court released its decision, dismissing the judicial review, and upholding the validity of sections, 5.1 and 5.5 of REGDOC 2.2.4, which are in sections that create the pre-placement and random testing requirements.

The Federal Court found that Section 5.1 and 5.5 do not infringe the Charter and the CNSC's decision to require pre-placement, and random testing was reasonable.

This section on top of page 15, states the applicants in the case, intend to appeal the decision to the federal court of appeal. This writer support CNSC REGDOC 2.2.4.

2.9 Environmental Protection

Table 9 – this table shows that the doses were well below the annual regulatory doors limit of 1 mSv for member of the public. It is noted there has been a decrease in 2022 from 2021 level which is what the public wanted to see.

2.12. - Security

My comments on this area are covered above under Darlington and Bruce Nuclear Power Plant sections. Very pleased to read the update on Section 2.12 Security.

The ROR reports that in 2023 the CNSC initiated a new regulatory and industry advisory group, the nuclear security advisory group the Nuclear Security Advisory Group (NUSAG) from CNSC and all NPP licenses.

The advisory group serves as a form for a collaboration between industry and the CNSC on matters related to security.

The CNSC, who has enforcement power as to be careful this forum for collaboration does not get too cozy with the industry when exercising its enforcement mandate could be weakened in this area of security.

The Commissioners need to keep a close eye on this advisory group by reviewing their record of proceedings and requesting summaries of the meetings. These reviewer questions whether such an advisory group is required as they are regulatory reporting mechanism for the Commission to be kept informed.

Section 2.15

This section of the Regulatory Oversight Report, titled Indigenous Consultation and Engagement was most helpful in understanding CNSC engagement activities in this area specifically understanding CNSC efforts and commitment to building long-term relationships and conducting ongoing engagement with Indigenous Nations and communities who have an interest in CNSC regulated facilities within their traditional and or treaty territories.

Appendix E was particularly helpful. This writer who resides in the region of the Point Lepreau Nuclear Generating Station would like to comment on these CNSC engagements efforts at this Station, as noted on page 36. These engagement efforts are note worthy and CNSC is encouraged to continue and broaden these engagements with First Nations and their representative. These efforts are what the public would expect in the spirit of truth and reconciliation.

2.1 5.2 under NB Power Page 39

This writer recognizes as well the good work NB Power is doing working with Indigenous Nations and as well as members of the public in their host communities including regular Community Liaison Committee Meetings, open houses, regular newsletters, website, updates, and regular engagement activities with local fishing communities and the public. In respect to working with the public aspect, the writer has attended most if not all of their open houses, which are well organized and informative. It should be noted that some of these open houses have been held in the City of Saint John 50 km from the local communities where PLNGS is located. This effort is to assist the wider population in the region understand PLNGS operational and safety programs. NB Power has developed excellent relationships with the surrounding communities near the PLNGS over the years. These efforts are evident to this writer through personal observations and feedback from any committee members in those communities these efforts and community engagement activities have been led by the Manager of Community Affairs and Nuclear Regulatory Protocol, Kathleen Duguay, whose efforts need to be acknowledged and commended for a job well done not just for 2022 but many years prior.

2.16 Other Matters of Regulatory Interest

2.16.1

Ontario Power Generating Station

This site related activities on Page 41 were impressive in respect to the wide variety of public information and engagement activities and the number of people receiving information under REGDOC 3.2.1 Public Information and Disclosure program Activities.

This writer wishes to add opposition from the intervenors to the remaining and rebrand of Waste Management Facilities to Nuclear Sustainability Services. In this writer's view such a name change appears to for more of a public relation purpose to perhaps avoid the industry telling the public they have waste storage on their sites. This fact will be hidden from public view with this new name Nuclear Sustainability Services. Quite frankly, it is deceptive and was not necessary.

In respect to the Section on NB Power under public information and disclosure program Section 2.16.1. This writer has observed and been impressed with their outreach communications in a timely manner about the unplanned outage at PLNGS in December 2022. As well as its annual outage. Hosting public information sessions demonstrates that NB Powe takes their public engagement and information sharing seriously. It is not wonder that a survey of 600 residents was so positive. The survey showed that nearly all residents expect to be closely informed about PLNGS. The majority agree that PLNGS operates efficiently and safely. This writer adds his opinion to the residents who completed the survey.

APPENDIX G Summary Table of the Status of Issues, Concerns and Requests from Intervenors in the 2021 NPGS ROR

This entire section is excellent. This reviewer in particular welcomed the section on page 159, section titles "Engagement" with other Public Intervenors Engaging with the public intervenors as outlined in this section is very welcomed.

These initiatives are ones that need to continue as part of the Regulatory Oversight Report follow up. For this writer reading this section on page 159, was a highlight after spending hours reviewing this report and preparing my commentary.

Concluding Comments

In conclusion, this community member is pleased to be able to offer commendatory on the regulatory Oversight Report for Canadian Nuclear Power generating sites for 2022. This written report identified many issues of concern and also recognizes the positive oversight efforts along with the efforts followed by the specific licensees covered in this report.

This writer continues to have the outmost respect in confidence the Canadian Nuclear Safety Commission in its efforts to carry out its legislative regulatory responsibility to keep all Canadians safety in the generation of nuclear energy. This regulatory report provides the kind of safety analysis information to demonstrate that these nuclear sites are operating safely in the best interest of the public and the environment. It is important to take this moment to thank the many CNSC staff who carry out their regulatory duties for a job well done. This conclusion is made after carefully reviewing the 2020 Regulatory Oversight Reports and several others over the years.

Respectfully submitted,



Gordon W. Dalzell, BA., B.S.W.

Community Member

Saint John, NB