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**Written submission from
Bruce Power**

**Mémoire de
Bruce Power**

In the Matter of

À l'égard de

**Application by Bruce Power, Ontario
Power Generation and New
Brunswick Power for the
Amendment of their Power Reactor
Operating Licences to implement
REGDOC-2.2.3, *Personnel
Certification, Volume III:
Certification of Reactor Facility
Workers, Version 2***

**Demande de Bruce Power, d'Ontario
Power Generation et de la Société
d'Énergie du Nouveau-Brunswick pour la
modification de permis d'exploitation
d'un réacteur de puissance afin de mettre
en œuvre le REGDOC-2.2.3, *Accréditation
du personnel, tome III : Accréditation des
travailleurs des installations dotées de
réacteurs, version 2***

Hearing in writing based solely on
written submissions

Audience fondée uniquement sur des
mémoires

January 2025

Janvier 2025

February 14, 2024

BP-CORR-00531-05112

Mr. Denis Saumure
Commission Registrar
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Saumure:

Application for the Amendment of the
Nuclear Power Reactor Operating Licence, Bruce Nuclear Generating Stations A and B

The purpose of this letter is to request an amendment of Bruce Power's Power Reactor Operating Licence, PROL 18.03/2028, pursuant to Sub-section 24(2) of the *Nuclear Safety and Control Act*, and Section 6 of the *General Nuclear Safety and Control Regulations* (GNSCR).

In October 2023, REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*, superseded REGDOC-2.2.3, *Personnel Certification, Volume III, Certification of Persons Working at Nuclear Power Plants*.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 PROL 18.03/2028 to replace the reference to REGDOC-2.2.3 *Volume III: Certification of Persons Working at Nuclear Power Plants*, with REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*.

Attachment A includes the information required for a Licence Amendment Application pursuant to the General Nuclear Safety and Control Regulations, Section 6, Application for Amendment, Revocation or Replacement of Licence”.

As discussed with CNSC staff, Bruce Power will provide an implementation plan for compliance with REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*, by end of March 2024.

If you require further information or have any questions regarding this submission, please contact Ms. Jennifer Smith, Department Manager Operations Training, at 226-930-4297.

Yours truly,



Digitally signed by
Maury Burton
Date: 2024.02.14
10:21:45 -05'00'

Maury Burton
Senior Director, Regulatory Affairs
Bruce Power

cc: CNSC Bruce Site Office

Attach.

Attachment A

**Application to Amend the Nuclear Power Reacting Operating Licence
Bruce Nuclear Generating Station A and B**

**Attachment A:
Application to Amend the Nuclear Power Reacting Operating Licence
Bruce Nuclear Generating Station A and B**

LEGAL SIGNING AUTHORITY

Mr. Dr. Mrs. Ms.

Name: Chris Mudrick

Title: Executive Vice President and Chief Nuclear Officer

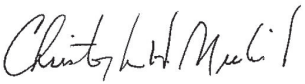
Telephone: 519-361-2673

Email: christopher.mudrick@brucepower.com

Applicant: Bruce Power Inc.

Address: PO Box 1540
Building 610, 177 Tie Road
Municipality of Kincardine,
Tiverton, ON
N0G 2T0

I, Chris Mudrick, have been designated by Bruce Power (A1) as having signing authority for this application, pursuant to the General Nuclear Safety and Control Regulations Section 15(a), 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: 2024/02/13
YYYY/MMM/DD

**Attachment A:
Application to Amend the Nuclear Power Reacting Operating Licence
Bruce Nuclear Generating Station A and B**

Introduction

This Attachment provides information to address the regulatory requirements for an application to amend the Power Reactor Operating Licence, PROL 18.03/2028, pursuant to the *General Nuclear Safety and Control Regulations* (GNSCR).

Information Required by the General Nuclear Safety and Control Regulations

GNSCR 6(a): [An application for the amendment... of a licence shall contain the following information:] 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.

REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*, was published in October 2023.

Bruce Power requests the Commission amend Licence Condition 2.4 of PROL 18.03/2028 to replace the reference to REGDOC-2.2.3 *Volume III: Certification of Persons Working at Nuclear Power Plants*, with superseding Regulatory Document, REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*.

Current Wording of PROL 18.03/2028, Licence Condition 2.4:

2.4 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.

Bruce Power proposes the following change:

The licensee shall implement and maintain certification programs in accordance with CNSC Regulatory document REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*.

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.

GNSCR 6(b): [An application for the amendment... of a licence shall contain the following information:] a statement identifying the changes in the information contained in the most recent application for the licence.

There is no change to any of the information contained in the most recent application for the PROL 18.03/2028.

GNSCR 6(c): [An application for the amendment... of a licence shall contain the following information:] 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.

The proposed modification does not impact or affect any nuclear substances, land, areas, buildings, structures, components, equipment or systems, as previously discussed in Reference A2.

This request is only applicable to the authorization training programs.

GNSCR 6(d): [An application for the amendment... of a licence shall contain the following information:] the proposed starting date and the expected completion date of any modification encompassed by the application.

Bruce Power is currently developing an implementation plan to ensure compliance with REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*. The implementation plan will be provided to CNSC staff by end of March 2024

References:

- A1. Letter, M. Burton to M. Hornof, "Bruce Power Authorized Delegates, Responsible Persons and Leadership Positions Responsible for Safety", October 24, 2023, BP-CORR-00531-04706.
- A2. Letter, F. Saunders to M. Leblanc, "Application for the Renewal of the Power Reactor Operating Licence for Bruce Nuclear Generating Stations A and B", June 30, 2017, e-Doc 5291208, NK21-CORR-00531-13493/NK29-CORR-00531-14085/NK37-CORR-00531-02768.