



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

**Mémoire de Ontario Power
Generation Inc.**

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

OPG Proprietary

February 15, 2024

CD# N-CORR-00531-23826

Mr. D. SaumureCommission Registrar
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Saumure:

Application to Amend the Darlington and Pickering Nuclear Generating Station Power Reactor Operating Licences, 13.03/2025 and 48.01/2028 Respectively

The purpose of this letter is to request that the Canadian Nuclear Safety Commission (the Commission) amend the Darlington Nuclear Generating Station (NGS) Power Reactor Operating Licence (PROL) 13.03/2025 and the Pickering NGS PROL 48.01/2028. This application is pursuant to Section 24(2) of the *Nuclear Safety and Control Act* and Section 6 of the *General Nuclear Safety and Control Regulations*.

In October 2023, the Commission superseded regulatory document REGDOC-2.2.3, Personnel Certification, Volume III: *Certification of Persons Working at Nuclear Power Plants* with REGDOC-2.2.3, Personnel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.

OPG requests amendments to Darlington NGS PROL 13.03/2025 and Pickering NGS PROL 48.01/2028 to replace the reference to regulatory document REGDOC-2.2.3, Personnel Certification, 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, as described in Attachments 1 and 2. Attachment 3 provides information pertaining to Section 6 of the *General Nuclear Safety and Control Regulations*.

OPG requests the amendments to Darlington NGS PROL 13.03/2025 and Pickering NGS PROL 48.01/2028, as described in Attachments 1 and 2, and subsequent updates of Licence Conditions Handbooks LCH-PR-13.03/2025-R005 and LCH-PR-48.00/2028-R005, at your earliest convenience.

OPG undertakes a Regulatory Management Action to complete a gap analysis and prepare the implementation plans for compliance with REGDOC-2.2.3, Personnel Certification, Volume III: *Certification of Reactor Facility Workers*, Version 2 requirements, by March 15, 2024, as detailed in Table 1.

If you have any questions, please contact Ms. Cristina Naidin, Director, Operations Training, at (905) 706-0198, or by email at cristina.naidin@opg.com.

Sincerely,

A handwritten signature in black ink, appearing to be 'S. Gregoris', with a large, stylized flourish at the end.

Steve Gregoris
Chief Nuclear Officer
Enterprise Operations
Ontario Power Generation Inc.

Attach.

cc: A. Viktorov - CNSC (Ottawa)
A. Mathai - CNSC (Ottawa)
R. Richardson - CNSC (Ottawa)
L. Désaulniers - CNSC (Ottawa)
C. Françoise - CNSC (Ottawa)
CNSC Site Office - Pickering
CNSC Site Office - Darlington

TABLE 1**Summary of Regulatory Management Actions Undertaken in this Submission**

Submission Title: "Application to Amend the Darlington and Pickering Nuclear Generating Station Power Reactor Operating Licences, 13.03/2025 and 48.01/2028 Respectively"

Regulatory Management Actions (REGM):

No.	Commitment Description	Date to be Completed
1.	Complete a gap analysis and prepare the implementation plans for compliance with REGDOC-2.2.3, Personnel Certification, Volume III: <i>Certification of Reactor Facility Workers</i> , Version 2.	March 15, 2024

Attachment 1 to OPG Letter, S. Gregoris to D. Saumure, "Application to Amend the Darlington and Pickering Nuclear Generating Station Power Reactor Operating Licences, 13.03/2025 and 48.01/2028 Respectively", CD# N-CORR-00531-23826

ATTACHMENT 1

Proposed Amendment to Darlington NGS PROL 13.03/2025

Prepared by: J. Cameron

Verified by: M. Priest

Attachment 1

Proposed Amendment to Darlington NGS PROL 13.03/2025

Current PROL 13.03/2025	Requested Amendment to PROL 13.03/2025
<p>2.3 The licensee shall implement and maintain training programs for workers. The certification process and supporting examinations and tests shall be conducted in accordance with CNSC regulatory document REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF PERSONS WORKING AT NUCLEAR POWER PLANTS.</p> <p>Persons appointed to the following positions require certification:</p> <ul style="list-style-type: none"> (i) Responsible Health Physicist; (ii) Shift Manager; (iii) Control Room Shift Supervisor; (iv) Authorized Nuclear Operator; and (v) Unit 0 Control Room Operator. 	<p>2.3 The licensee shall implement and maintain training programs for workers.</p> <p>2.4 The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document <i>REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF REACTOR FACILITY WORKERS, VERSION 2.</i></p> <p>Persons appointed to the following positions require certification:</p> <ul style="list-style-type: none"> (i) Responsible Health Physicist; (ii) Shift Manager; (iii) Control Room Shift Supervisor; (iv) Authorized Nuclear Operator; and (v) Unit 0 Control Room Operator.

ATTACHMENT 2

Proposed Amendment to Pickering NGS PROL 48.01/2028

Prepared by: J. Cameron

Verified by: E. Devlin

Attachment 2

Proposed Amendment to Pickering NGS PROL 48.01/2028

Current PROL 48.01/2028	Requested Amendment to PROL 48.01/2028
<p>2.3 The licensee shall implement and maintain training programs.</p> <p>2.4 The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document REGDOC-2.2.3, <i>Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants</i>.</p> <p>Persons appointed to the following positions require certification:</p> <ul style="list-style-type: none"> (i) Responsible Health Physicist; (ii) Shift Manager; (iii) Control Room Shift Supervisor; and (iv) Authorized Nuclear Operator. 	<p>2.3 The licensee shall implement and maintain training programs.</p> <p>2.4 The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document <i>REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2</i>.</p> <p>Persons appointed to the following positions require certification:</p> <ul style="list-style-type: none"> (i) Responsible Health Physicist; (ii) Shift Manager; (iii) Control Room Shift Supervisor; and (iv) Authorized Nuclear Operator.

Attachment 3 to OPG Letter, S. Gregoris to D. Saumure, "Application to Amend the Darlington and Pickering Nuclear Generating Station Power Reactor Operating Licences, 13.03/2025 and 48.01/2028 Respectively", CD# N-CORR-00531-23826

ATTACHMENT 3

Information Required for Amendment, Revocation or Replacement of a Licence Pursuant to Section 6 of the General Nuclear Safety and Control Regulations

Prepared by: J. Cameron

Verified by: E. Devlin

M. Priest

Attachment 3

Information Required for Amendment, Revocation or Replacement of a Licence Pursuant to Section 6 of the General Nuclear Safety and Control Regulations

Reference: Section 6 of the *General Nuclear Safety and Control Regulations*:

6. An application for the amendment, revocation or replacement of a licence shall contain the following information:
- (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;*

This is a request for licence amendment to Darlington's PROL 13.03/2025 and to Pickering's PROL 48.01/2028 to revise a currently licensed activity:

Darlington:

2.3 The licensee shall implement and maintain training programs for workers. The certification process and supporting examinations and tests shall be conducted 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;
- (iv) Authorized Nuclear Operator; and
- (v) Unit 0 Control Room Operator.

Pickering:

2.3 The licensee shall implement and maintain training programs.

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

This request will revise Section 2.3 or Section 2.4 of the respective license to refer to REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2*.

OPG will complete a gap analysis and prepare the implementation plans for compliance with REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2* by March 15, 2024.

Attachment 3 to OPG Letter, S. Gregoris to D. Saumure, "Application to Amend the Darlington and Pickering Nuclear Generating Station Power Reactor Operating Licences, 13.03/2025 and 48.01/2028 Respectively", CD# N-CORR-00531-23826

During implementation, OPG will revise the applicable governance to reflect the REGDOC-2.2.3 Version 2 requirements for certification of nuclear power plant personnel. Documents to be revised will include:

- 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".

- (b) *a statement identifying the changes in the information contained in the most recent application for the licence;*

This revised activity does not change any of the information contained in the most recent applications for the Darlington or Pickering licences (Ref. 1 to 13).

- (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*

Not Applicable.

- (d) *the proposed starting date and the expected completion date of any modification encompassed by the application.*

OPG will complete a gap analysis and prepare the implementation plans for compliance with REGDOC-2.2.3, Personnel Certification, Volume III: *Certification of Reactor Facility Workers*, Version 2, by March 15, 2024.

References:

1. OPG Letter, B. Duncan to M. Leblanc, "Darlington NGS - Application for Renewal of the Darlington Nuclear Generating Station Power Reactor Operating Licence 13.00/2014", December 13, 2013, CD# NK38-CORR-00531-16490.
2. OPG Letter, B. Duncan to M. Leblanc, "Darlington NGS - Additional Information in Support of Application for Renewal of Darlington's Power Reactor Operating Licence (PROL) 13.01/2015", January 30, 2015, CD# NK38-CORR-00531-17206.
3. OPG Letter, B. Duncan to M. Leblanc, "Darlington NGS - Application for Darlington Nuclear Generating Station Power Reactor Operating Licence PROL 13.00/2025 Amendment", March 17, 2017, CD# NK38-CORR-00531-18350.
4. OPG Letter, S. Gregoris to M. Leblanc, "Darlington NGS - Application for Darlington Nuclear Generating Station Power Reactor Operating Licence 13.01/2025 Amendment", December 5, 2018, CD# NK38-CORR-00531-20359.

Attachment 3 to OPG Letter, S. Gregoris to D. Saumure, "Application to Amend the Darlington and Pickering Nuclear Generating Station Power Reactor Operating Licences, 13.03/2025 and 48.01/2028 Respectively", CD# N-CORR-00531-23826

5. 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.
6. OPG Letter, S. Gregoris to M. Leblanc and G. Frappier, "Darlington NGS – Molybdenum-99: Updated Request for Amendment to the Darlington Nuclear Generating Station Power Reactor Operating Licence 13.02/2025", June 23, 2020, CD# NK38-CORR-00531-21744.
7. OPG Letter, S. Gregoris to M. Leblanc, "Darlington NGS – Molybdenum-99: Addendum to the Request for Amendment to the Darlington Nuclear Generating Station Power Reactor Operating Licence 13.02/2025", February 11, 2021, CD# NK38-CORR-00531-22275.
8. OPG letter, R. Geofroy to D. Saumure, "Darlington NGS – Notice of Intent to Renew Power Reactor Operating Licence PROL 13.03/2025", March 30, 2023, NK38-CORR-00531-24175.
9. OPG Letter, R. Lockwood to M. Leblanc, "Application for Renewal of Pickering Nuclear Generating Station Power Reactor Operating Licence," August 28, 2017, CD# P-CORR-00531-05055.
10. OPG Letter, R. Lockwood to M. Leblanc, "Supplementary Information to the Application for Renewal of the Pickering Nuclear Generating Station Power Reactor Operating Licence," December 11, 2017, CD# P-CORR-00531-05223.
11. OPG Letter, J. Franke to M. Leblanc, "Pickering NGS - Application for Amendment of the Pickering Nuclear Generating Station Power Reactor Operating Licence PROL 48.00/2028", November 13, 2019, CD# P-CORR-00531-05831.
12. OPG Letter, J. Franke to R. Richardson, "Intent to Seek CNSC Authorization to Operate Pickering NGS Units 5-8 Beyond December 31, 2024 to September 30, 2026", December 12, 2022, CD# P-CORR-00531-23091.
13. OPG Letter, J. Franke to D. Saumure, "Pickering Nuclear Generating Station – Power Reactor Operating Licence Amendment Application," June 16, 2023, CD# P-CORR-00531-23266.