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Update from CNSC Staff

Mise à jour du personnel de la CCSN

Updates on items from previous Commission meetings

Mise à jour des points abordés lors des réunions précédentes de la Commission

Commission Meeting

Réunion de la Commission

November 7, 2024

7 novembre 2024



MEMORANDUM

NOTE DE SERVICE

Security Classification - Classification de sécurité

UNCLASSIFIED

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Fully releasable ATIP - Entièrement publiable AIPRP :

Yes/Oui / No/Non

To Candace Salmon
A Commission Registrar

2024-10-08

From X [Signature]
De Alexandre Viktorov
Director General-DPRR
Signed by: Viktorov, Alexandre

Subject: Commission Action from Bruce Power Mid-term Update of Licensed Activities Commission Meeting – CNSC Staff’s Responses to the Recommendations from CMD 23-M27.29, Nuclear Transparency Project Written Intervention

ISSUE/QUESTION

Following the Bruce Power Mid-term Update of Licensed Activities Commission Meeting on September 20, 2023, the Commission placed one action on CNSC staff to provide responses to the recommendations in the Nuclear Transparency Project (NTP) written intervention CMD 23-M27.29 [1]. NTP’s submission consisted of 20 recommendations within the main body of the submission that were directed at CNSC and/or Bruce Power; the recommendations were associated with various subjects, including but not limited to public information and disclosure, and environmental data reporting. There were also 15 more recommendations included in Appendix A, originally from a NTP submission prepared for the CNSC-Environment and Climate Change Canada (ECCC)-Environmental Non-Governmental Organizations (ENGO) National Pollutant Release Inventory (NPRI) working group. The Commission members had expressed interest in the applicability of all the recommendations, and had requested that CNSC and Bruce Power address them as part of a future proceeding.

This action was specified in item #33 from the Commission meeting minutes [2]. The purpose of this memo is to address this action by providing the Commission with CNSC staff’s responses to the recommendations.

Results from Review of NTP Recommendations

The CNSC project team that worked toward addressing this Commission action and developing the responses consisted of staff from the following divisions:

- Bruce Regulatory Program Division (BRPD)
- Health Sciences and Environmental Compliance Division (HSECD)



- Corporate and Regulatory Communications Division (CRCD)
- Indigenous and Stakeholder Relations Division (ISRD)
- Commission Registry

Table 1 below includes all NTP recommendations from the submission that were applicable to CNSC and/or Bruce Power. For the recommendations directed at CNSC, the responses include if CNSC staff are or are not accepting the recommendation by indicating if changes to current processes or practices will be made at this time, if corresponding actions are required, and rationale for each decision. In addition, for the recommendations directed at Bruce Power, the responses include if there are concerns related to nuclear safety or with Bruce Power’s compliance in the areas of public information and disclosure or environmental data reporting, and if CNSC staff expect Bruce Power to address anything, and the rationale supporting this.

Responses to the NTP recommendations from Appendix A of the submission, *NTP submissions to CNSC-ECCC-ENGO NPRI Working Group*, were also included. The reason for this is item #33 with the action from the minutes of the Commission meeting [2] specifically mentions “...Nuclear Transparency Project’s recommendations aiming at making current disclosures of data on the Open Government Portal more user friendly.” The NTP recommendations in Appendix A directly relate to improving the Open Government Portal and making the radionuclide data more user-friendly and informative.

The Commission meeting transcript [3], page 164, indicates that CNSC staff expressed to the Commission that their intentions with addressing these recommendations depends on their relation to safety. Though responses were prepared for all recommendations, CNSC staff used this as a contributing factor when considering acceptance and/or initiating changes and actions for the recommendations.

Table 1: CNSC Staff’s Responses to the Recommendations from CMD-23-M27.29, Nuclear Transparency Project Written Intervention

CMD 23-M27.29, Nuclear Transparency Project (NTP) Submission Section and/or Recommendation	CNSC Staff Response
<i>Main body of NTP submission</i>	
Indigenous jurisdiction and the CNSC’s regulatory context (Page 3)	<p>Applicable to: CNSC</p> <p><i>*Not framed as a recommendation, so no formal acceptance; however, CNSC staff identified a need to respond.</i></p> <p>The CNSC is not a rights-determining body. The CNSC encourages Indigenous Nations and communities to outline the nature and scope of the rights and interests that they feel may be adversely affected by a proposed project or activity regulated by the CNSC. The CNSC also encourages them to bring forward any issues and concerns throughout the EA and/or licensing process.</p> <p>CNSC staff work closely with Indigenous Nations and communities to understand if any potential adverse impact</p>



	<p>on Indigenous rights or interests arises from a CNSC environmental assessment or licensing decision, and also work collaboratively to address those concerns to the greatest extent possible while ensuring that the CNSC upholds the honour of the Crown and meet its consultation obligations. This can include the development a mutually agreeable arrangement for consultation and engagement for specific projects and regulatory processes with potentially impacted Nations.</p>
<p>Concerns with qualifying language in REGDOC-3.2.1</p> <p>Recommendation 1: that CNSC consider an impact-based approach to licensee disclosure requirements rather than a risk-based approach. (Page 5)</p>	<p>Applicable to: CNSC</p> <p><u>CNSC staff do not accept this recommendation.</u></p> <p>Risk-informed regulating is the overall approach taken by the CNSC. Risk is factored into the CNSC’s regulatory framework as well as its licensing, compliance and enforcement activities. CNSC makes science- and evidence-based decisions and takes risk-informed regulatory actions.</p> <p>To be consistent with this overall approach, REGDOC-3.2.1, <i>Public Information and Disclosure</i>, Section 2, Public Information Program, Subsection 2.1, Overview, states that “the public information program and its disclosure protocol shall be commensurate with the public’s perception of risk and the level of public interest in the licensed activities.”</p> <p>Risk is not the only requirement for disclosure in REGDOC-3.2.1. The public’s interest, and relevance of the licensed activities which may impact the communities or identified target audiences are also key factors in the licensee’s decision to disclose information.</p> <p>CNSC staff note that REGDOC-3.2.1 is currently undergoing review. NTP is invited to provide further information about this recommendation in their review of the discussion paper, which is currently open for public review and comment, and in the upcoming stakeholder workshop to which NTP will be invited.</p>
<p>Evaluation of Bruce Nuclear compliance with REGDOC 3.2.1</p> <p>Recommendation 2: that Bruce Nuclear amend their target audiences to broaden the term “charities” either by using the term “civil society organizations” instead or else the phrase “charities and non-profit organizations”. (Page 6)</p>	<p>Applicable to: Bruce Power</p> <p>As a part of the Public Information and Disclosure Program (PIDP), licensees are required to review their program regularly. This could include reviewing tactics, audiences, messaging and implementing any changes, modifications to the program that would improve or enhance the effectiveness of their programs. It would be beneficial and inclusive to broaden the target audience language to</p>



	<p>include “civil society organizations”, however it is not necessary to continue to meet its PIDP requirements.</p> <p>Bruce Power is compliant with the PIDP requirements set out in REGDOC-3.2.1. Bruce Power may wish to consider this recommendation for continuous improvement.</p>
<p>Bruce Nuclear’s Public Information Program</p> <p>Recommendation 3: that CNSC staff ensure communications to students and schools concern the science of nuclear energy generation rather than arguments relating to its necessity or desirability. (Page 6)</p>	<p>Applicable to: CNSC</p> <p><u>CNSC staff do not accept this recommendation.</u></p> <p>In alignment with the CNSC mandate to disseminate objective scientific, technical, and regulatory information to the public, all CNSC communications and outreach to Indigenous Nations and communities, members of the public, and stakeholders are, and will continue to be objective, technology-agnostic, and non-promotional of nuclear.</p> <p>Bruce Power’s education content and outreach messaging addresses their own public education objectives as an independent nuclear organization. Bruce Power is meeting their PIDP and public outreach obligations, of which CNSC staff have not identified any safety or regulatory concerns.</p>
<p>Bruce Nuclear’s Public Information Program</p> <p>Recommendation 4: that Bruce Nuclear include on its webpage how often its public information is revised and how public inquiries will be responded to and recorded. (Page 6)</p>	<p>Applicable to: Bruce Power</p> <p>Bruce Power is currently meeting requirements for posting their PIDP information online. As a part of the PIDP, licensees are required to review their program regularly. Bruce Power could choose to indicate when the PIDP was last updated and if any significant changes/improvements were made, but this is not a requirement.</p> <p>Bruce Power is compliant with the PIDP requirements set out in REGDOC-3.2.1. Bruce Power may wish to consider this recommendation for continuous improvement.</p>
<p>Bruce Nuclear’s Public Disclosure Protocol</p> <p>Recommendation 5: that Bruce Nuclear include a commitment to publicly disclose machine-readable disaggregated data and monitoring locations in its Public Disclosure Protocol. (Page 7)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that this is not a PIDP requirement, and that Bruce Power is compliant with the PIDP requirements set out in REGDOC-3.2.1. Bruce Power may wish to consider this recommendation for continuous improvement to their PIDP.</p>
<p>Bruce Nuclear’s Public Disclosure Protocol</p> <p>Recommendation 6: that Bruce Nuclear disclose the criteria it uses for determining when information or reports are published online. (Page 7)</p>	<p>Applicable to: Bruce Power</p> <p>REGDOC-3.2.1 outlines guidance for a public disclosure protocol. Though licensees should strive to be open and transparent in their relations with community</p>



	<p>representatives, target audiences and the public, disclosing these criteria is not a specific PIDP requirement.</p> <p>Bruce Power is compliant with the PIDP requirements set out in REGDOC-3.2.1. Bruce Power may wish to consider this recommendation for continuous improvement to their PIDP.</p>
<p>Bruce Nuclear’s Public Disclosure Protocol</p> <p>Recommendation 7: that Bruce Nuclear explicitly commit in its Public Disclosure Protocol to notify members of the public via social media whenever an event report is posted to its website. (Page 7)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that this is not a PIDP requirement, and that Bruce Power is compliant with the PIDP requirements set out in REGDOC-3.2.1. Bruce Power may wish to consider this recommendation for continuous improvement to their PIDP.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Protection Reports</p> <p>Recommendation 8: that Bruce Nuclear release disaggregated data with annual Environmental Protection Reports (Page 8)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no reporting requirement in version 2 of REGDOC-3.1.1, <i>Reporting Requirements for Nuclear Powerplants</i>, for Bruce Power to report disaggregated data with annual Environmental Protection Reports. CNSC staff request and review disaggregated data from Bruce Power during compliance inspections.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Protection Reports</p> <p>Recommendation 9: that Bruce Nuclear release disaggregated data in machine readable formats along with its EPRs (Page 8)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no reporting requirement in version 2 of REGDOC-3.1.1 for Bruce Power to report data in machine readable formats. However, in version 3 of REGDOC-3.1.1, there is a requirement for licensees of nuclear power generating stations to provide their effluent and emissions data in machine readable format in their quarterly safety performance indicator report.</p> <p>Bruce Power is currently expected to follow the reporting requirements of version 2 of REGDOC-3.1.1; <u>however, when version 3 is implemented, CNSC staff will be expecting Bruce Power to provide effluent and emissions data in machine readable format.</u></p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Protection Reports</p> <p>Recommendation 10: that Bruce Nuclear release detailed monitoring locations along with any raw data released (preferably as geographical coordinates, if available) (Page 9)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no reporting requirement in version 2 of REGDOC-3.1.1 for Bruce Power to provide detailed monitoring locations in the annual environment report. However, Bruce Power is required to implement an environmental monitoring program that meets the requirements in CSA N288.4, <i>Environmental monitoring</i></p>



	<p><i>programs at Class I nuclear facilities and uranium mines and mills.</i> This environmental monitoring program must contain the detailed monitoring locations. CNSC staff review the program during desktop reviews. The results of these programs are summarized in the annual report on environmental protection.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Protection Reports</p> <p>Recommendation 11: that Bruce Nuclear provide diagrams of groundwater flow as well as the currents and flow directions of monitored surface water (Page 9)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no reporting requirement in version 2 of REGDOC-3.1.1 for Bruce Power to provide diagrams of groundwater flow. CNSC staff request this information from Bruce Power during compliance verification activities.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Protection Reports</p> <p>Recommendation 12: that Bruce Nuclear and CNSC staff consider releasing radiological data with Sievert or Gray units so that the public may better assess the significance of reported values for ecological and human receptors. (Page 9)</p>	<p>Applicable to: CNSC and Bruce Power</p> <p><u>CNSC staff do not accept this recommendation.</u></p> <p>CNSC staff release radiological data in the same format that is received from the licensees.</p> <p>Radiological releases are measured and reported in becquerels because the equipment and methodologies used by licensees detect the total amount of activity in the emission or effluent stream.</p> <p>It is difficult to report releases to the environment in sieverts or grays. This is because the link between sieverts and becquerels is the environmental transport model that is described in CSA N288.1-20, <i>Guidelines for modelling radionuclide environmental transport, fate, and exposure associated with the normal operation of nuclear facilities.</i> This model relies on many assumptions and simplifications to convert the total amount of activity to a dose. Therefore, there is a lot of conservatism in the calculated doses to account for any uncertainties.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Protection Reports</p> <p>Recommendation 13: that Bruce Nuclear provide mass and concentration values for measured released contaminants.</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that the total mass of hazardous substances that are above the reporting thresholds are reported to Environment and Climate Change Canada’s National Pollutant Release Inventory (NPRI). This data is available on the NPRI website.</p>



	<p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Environmental Risk Assessments</p> <p>Recommendation 14: that Bruce Nuclear consider providing raw machine-readable monitoring data and geographic coordinates for monitoring locations featured in its ERAs so that data can be analyzed alongside the data available in annual EPRs.</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no reporting requirement in version 2 of REGDOC-3.1.1 for Bruce Power to provide this information. However, this information is requested by CNSC staff during compliance verification activities, such as the review of the ERA, to verify that the environmental monitoring data is within predictions and that the environment is protected.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Online interactive applications disclosing environmental monitoring data.</p> <p>Recommendation 15: that Bruce data apps clearly define the scope (and any limitations or boundaries) of their data.</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no requirement for how to disclose monitoring data using an online interactive application.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Comments on Bruce Nuclear’s disclosure practices – Online interactive applications disclosing environmental monitoring data.</p> <p>Recommendation 16: that CNSC staff consult with members of the public, civil society organizations, and Indigenous Nations, communities and organizations about how to regulate new online apps developed by licensees to communicate environmental data. (Page 11)</p>	<p>Applicable to: CNSC</p> <p><u>CNSC staff do not accept this recommendation.</u></p> <p>This recommendation is outside the scope of the CNSC’s mandate and authority. REGDOC-3.2.1 does not prescribe how, or which apps a licensee should use to communicate with its audiences. CNSC staff encourage licensees to strive for openness and transparency in their relations with Indigenous Nations and communities, local community representatives, target audiences and the public. Licensees should seek to gain an understanding of what information their audiences wish to know and how they would prefer to receive it. CNSC staff review licensees’ practices to ensure that the information is available, appropriate and transparent.</p>
<p>Areas for further disclosure in the future</p> <p>Recommendation 17: that Bruce Nuclear consider publicly disclosing further (preferably raw and machine-readable) data relating to impingement and entrainment monitoring results as they are collected. (Page 12)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that there is no reporting requirement in version 2 of REGDOC-3.1.1 for Bruce Power to provide data related to impingement and entrainment monitoring results as they are collected. CNSC staff request and review this information from Bruce Power during compliance inspections.</p>



	Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.
<p>Areas for further disclosure in the future</p> <p>Recommendation 18: that Bruce Nuclear consider publicly disclosing more information relating to its “green bonds”, including exactly how proceeds are allocated according to Bruce’s Green Financing Framework. (Page 12)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that this information is not part of the CNSC’s environmental protection framework. Therefore, CNSC staff do not review it and there is no reporting requirement.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>Areas for further disclosure in the future</p> <p>Recommendation 19: that Bruce Nuclear provide more information on the progress of its Carbon Offset Accelerator Fund as it continues, including any data relating its outcomes and predicted success. (Page 12)</p>	<p>Applicable to: Bruce Power</p> <p>CNSC staff note that this information is not part of the CNSC’s environmental protection framework. Therefore, CNSC staff do not review it and there is no reporting requirement.</p> <p>Bruce Power may wish to consider this recommendation for continuous improvement to their environmental reporting.</p>
<p>NTP concerns over intervention timeframes.</p> <p>Recommendation 20: that future mid-term licence update meetings provide six months to a year for intervention processes. (Page 13)</p>	<p>Applicable to: CNSC</p> <p><u>CNSC staff do not accept this recommendation.</u></p> <p>The CNSC’s current approach to intervention periods is outlined in REGDOC-3.4.1, <i>Guide for Applicants and Intervenors Writing CNSC Commission Member Documents</i>, Section 1.6.2, Submission timelines, which sets the intervention timeframe at 30-60 business days. CNSC staff note that these timelines apply to Commission hearings; however, they are generally applicable to Commission meeting items that also include public participation.</p> <p>The CNSC Registry has taken the suggestion of longer timelines, including for mid-term updates, under advisement; however, at this time, longer timelines will only be considered on a case-by-case basis. Broader procedural changes may be considered in the future.</p>
Appendix A – NTP submissions to CNSC-ECCC-ENGO NPRI Working Group	
<i>Recommendations to make current disclosures of data on the Open Government Portal more user friendly</i>	
<p>Recommendation 1: Explanations of uploaded radionuclide data (Page 16)</p>	<p><u>CNSC staff accept this recommendation.</u></p> <p>On the CNSC Open Government portal, there are references to the CNSC’s Regulatory Oversight Report</p>



	<p>(ROR), where the user can obtain a more detailed explanation of the data.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>
Recommendation 2: Contextualizing radionuclide data with maps of stacks and effluent discharge (Page 17)	<p><u>CNSC staff accept this recommendation.</u></p> <p>This feature is already available. The user can map the radionuclide loading data in the Federal Geospatial Platform.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>
Recommendation 3: Accessible 'errata' notes on accompany datasets (Page 17)	<p><u>CNSC staff accept this recommendation.</u></p> <p>CNSC staff have taken steps to improve in this area. In 2023, the CNSC published a new spreadsheet that contains any errata that were identified in a previous version of the datasets.</p> <p><u>Based on the efforts made to-date, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>
Recommendation 4: Automatization to avoid human error (Page 17)	<p><u>CNSC staff accept this recommendation.</u></p> <p>CNSC staff have taken steps to improve in this area. In 2024, CNSC staff asked some of the licensees to provide effluent and environmental monitoring data in a machine-readable format, such as comma-separated values (CSV) files. This will make the data entry process more efficient.</p> <p><u>Based on the efforts made to-date, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>
Recommendation 5: Standardized terms and measurements (Page 18)	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>There are currently no standardized terms and measurements related to detection limits because there is no requirement for all licensees to standardize their terms and measurements related to detection limits. Therefore, this would have to be manually updated by the CNSC.</p> <p><u>Although this will be considered in the future as the regulatory framework evolves, CNSC staff have not</u></p>



	<p><u>identified a need to initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 6: Estimated public dose could be reported in its own column (Page 18)</p>	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>There is not a separate column with the estimated dose to public because the format of the spreadsheet is analogous with the NPRI spreadsheets.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 7: Cross-referencing radiological and non-radiological data for nuclear facilities on open government portal (Page 19)</p>	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>CNSC staff note that the Open Government portal has a robust search engine. Therefore, the CNSC's data file uploads are easily searchable. CNSC staff also note that there are linkages between the NPRI portal and the CNSC's Open Government portal. A user searching for non-radionuclide releases from a CNSC-regulated facility on the NPRI portal will be directed to the CNSC Open Government portal where they can get the radionuclide releases.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 8: Greater transparency around reporting non-routine releases (Page 19)</p>	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>CNSC staff note that if a significant spill was to occur, it would be brought up to the Commission as an Event Initial Report (EIR) and would also be posted online on the CNSC and the licensee's website. This provides transparency around reporting non-routine releases.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 9: Adding regulatory limits to release values for context (Page 19)</p>	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>There is not a separate column with the regulatory limits because the format of the spreadsheet is analogous with the NPRI spreadsheets. There are links to the CNSC RORs which have the regulatory limits for releases to the environment.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>



<p>Recommendation 10: Transparency of dataset categories (Page 19)</p>	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>Canadian Nuclear Laboratories (CNL) facilities have their own spreadsheet on the Open Government portal because they are presented together in the ROR. The CNL spreadsheet is meant to supplement the ROR. This allows the user to obtain all of the information related to the environmental protection safety and control area in one document.</p> <p><u>Based on this, CNSC staff have not identified a need to implement changes in this area or initiate formal actions for this recommendation at this time.</u></p>
<p><i>Recommendations for additional data disclosure</i></p>	
<p>Recommendation 11: Including disaggregated environmental monitoring data (Page 20)</p>	<p><u>CNSC staff accept this recommendation.</u></p> <p>The current data displays the total radionuclides released to the environment, which was the original objective. CNSC staff have taken steps to improve in this area with discussions and plans to upload spreadsheets with detailed effluent and environmental monitoring data in the future.</p> <p><u>Based on this, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 12: Including data relating to additional containment pathways (Page 20)</p>	<p><u>CNSC staff accept this recommendation.</u></p> <p>The current data displays the total radionuclides released to the environment, which was the original objective. CNSC staff have taken steps to improve in this area with discussions and plans to upload spreadsheets with environmental monitoring data, including ambient air, surface water, groundwater, and stormwater. In the meantime, the results of these environmental monitoring programs are often available in the licensee’s annual environment reports, which are publicly available on the licensee’s website or by making a request to the licensee.</p> <p><u>Based on this, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 13: Contextualizing Independent Environmental Monitoring Program data (Page 20)</p>	<p><u>CNSC staff accept this recommendation.</u></p> <p>CNSC staff have taken steps to improve in this area. The CNSC’s Independent Environmental Monitoring Program (IEMP) objectives have been revised to emphasize that the IEMP builds Indigenous and public trust and the results add to the body of evidence that the environment is protected.</p>



	<p><u>Based on the efforts made to-date, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 14: Disclosures and protocols that observe and respect Indigenous data sovereignty (Page 21)</p>	<p><u>CNSC staff accept this recommendation.</u></p> <p>The CNSC acknowledges the importance of working with, considering and reflecting Indigenous Knowledge alongside regulatory information in its assessments and regulatory processes. The CNSC’s Indigenous Knowledge Policy Framework outlines the CNSC’s best practices for working with, protecting, validating, and understanding Indigenous knowledge. The CNSC’s approach to working with, reflecting and protecting Indigenous Knowledge is outlined in the CNSC’s reconciliation framework.</p> <p><u>Based on the efforts made to-date, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>
<p>Recommendation 15: Greater clarity of nuclear data disclosure scope and the work of this task force (Page 21)</p>	<p><u>CNSC staff do not accept this recommendation.</u></p> <p>Transportation data, economic data and sociological data will not be posted due to confidentiality reasons or because they are outside of the CNSC’s mandate. Power Reactor Operating Licences (PROLs) and Licence Conditions Handbooks (LCHs) may be posted online in the future. In the meantime, the public can request a copy of the licence and the LCH by making a request through the CNSC Info account.</p> <p><u>Based on this, CNSC staff have not identified a need to initiate formal actions for this recommendation at this time.</u></p>

CONCLUSION

Based on the review of all NTP recommendations in the submission, CNSC staff conclude that no changes to regulatory requirements or station specific actions were required based on the recommendations. Responses consisting of a brief explanation of the CNSC processes and/or practices currently in effect for the subjects discussed are deemed sufficient to address NTP’s comments and expand on the reason for response for each recommendation. Although CNSC staff indicate in their responses to some of the recommendations that it will be taken into consideration moving forward, no additional formal actions are proposed at this time.

For the recommendations directed at Bruce Power, CNSC staff did not identify any concerns related to nuclear safety or with Bruce Power’s compliance in the areas of public information and disclosure and environmental data reporting. Therefore, based on the review of each recommendation described in Table 1, CNSC staff conclude that there is no need to place any expectations on Bruce Power at this time, and they can take the NTP recommendations under advisement as they see fit.



CNSC staff acknowledge and value the Nuclear Transparency Project's (NTP) participation and interest in the Bruce Power Mid-term Update of Licensed Activities Commission Meeting on September 20, 2023.

Acknowledgement of concurrence with Director General decision:

I approve

I do not approve

10/8/2024

X Ramzi Jammal

X

Ramzi Jammal

Executive Vice-President and CROO

Signed by: Jammal, Ramzi

Ramzi Jammal

Executive Vice-President and CROO

Prepared by Anupama Bulkan, Regulatory Program Director-Bruce Regulatory Program Division

References

- [1] "CMD 23-M27.29, Written submission from the Nuclear Transparency Project – Bruce Power Mid-term Update of Licensed Activities", e-Doc 7101178.
- [2] "Minutes of the Canadian Nuclear Safety Commission (CNSC) Meeting held on September 20-21, 2023", e-Doc 7166879.
- [3] "Transcript of September 20, 2023, Public Meeting Bruce Power Midterm", e-Doc 7137757.