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Safety Commission

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de sûreté nucléaire

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**Written submission from
Gordon W. Dalzell**

**Mémoire de Gordon W.
Dalzell**

**Regulatory Oversight Report
for Canadian Nuclear Power
Generating Sites for 2023**

**Rapport de surveillance
réglementaire des sites
nucléaires pour 2023**

Commission Meeting

Réunion de la Commission

February 25, 2025

Le 25 février 2025

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January 9, 2025

Email letter to: interventions@cnsccsn.qc.ca

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To Whom It May Concern:

SUBJECT: Regulatory Oversight Report for Canadian Nuclear Power Generating Sites: 2023

This letter is to provide my comments in writing on the review of the Regulatory Oversight Report Canadian Nuclear Power Generating Sites 2023.

Background information on commentator:

This writer is an interested party involved in the environmental movement who follows the nuclear energy issues. I have 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 (most recently, in October of 2023).

As well, this writer is co-founder of the Saint John Citizens Coalition for Clean Air (registered member of the New Brunswick Environmental Network) an environmental public interest group advocating for clean air in our local and regional area of Saint John, NB.

Regulatory Oversight Report for Canadian Nuclear Power Generating Sites 2023:

I have closely reviewed the "Regulatory Oversight Report for Canadian Nuclear Power Generating Sites: 2023."

Unfortunately, I am not in a position this year to prepare and submit as fulsome intervention as I have in past years. However, that should not in any way indicate my lack of interest in the report or my continued interest in the nuclear industry or PLNGS.

However, this writer would like to share with the CNSC some observations and feedback on the current regulatory oversight report as well as some of the engagement activities that I participated in.

As a result of the questions, I have raised in past interventions regarding the PLNGS, I was invited to spend time with station staff and participate in activities to address my areas of interest.

The following are some examples from 2023 & 2024.

- I toured the station, was provided a briefing on safety and operational equipment and procedures and learned about the safety culture of the station through discussions with staff in various work functions.
- I attended a joint meeting between station leaders and local First Nations representatives. I observed first-hand the commitment and respect that PLNGS staff have for First Nations communities and their culture.
- I was invited into the station training simulator to see the rigorous program that senior level staff are put through in their qualifications and learned about the succession planning program to ensure continuity of authorized staff.
- I met personally with the station's subject matter expert in the area of parts obsolescence and aging management program which has been an ongoing concern for this writer as this plant has been in operations since 1982 and refurbished in 2012 (primarily the nuclear side) to learn about the programs in place to address this issue.
- I attended several public information open houses and saw the obvious commitment and dedication of PLNGS staff to engagement and communications with the community.

I am grateful to have had these opportunities and now feel more confident and knowledgeable about many of the issues and gaps raised in my past interventions. Rest assured, I will still be closely monitoring station and industry activities and have every intention of continuing to participate in future CNSC meetings and hearings.

More specific to the 2023 ROR

Point Lepreau Nuclear Generating Station

- 1. This writer noted that there was one low safety significant finding related to a contractor performing work without the required training. (P.106)**
 - it would be helpful to learn the significance and the safety implication for this contractor performing work with required training.
 - What kind of work was this contractor doing?
- 2. One low safety significant finding was due to some workers in safety-sensitive positions exceeded their hours of work limits. (P.106)**
 - Exceedance of hours of work for safety sensitive positions is always a concern since it has the potential to impact the safe operations of the plant.

3. CNSC staff confirmed that NB Power has maintained sufficient personnel at PLNGS for all certified positions, and that all certified workers possessed the necessary knowledge and skills to perform their duties safely and competently. (P. 107)

- This writer is pleased to learn that NB Power has maintained sufficient personnel at PLNGS for all certified positions. This is an improvement from the previous year when challenges were identified where the candidate from the post secondary institutions were not able to reach the proficient standard for the licence program at PLNGS.
- This writer in consultation with the PLNGS representative has learned that corrective actions has been to effectively address this past issue.

4. PLNGS experienced a 5-day unplanned outage November 15-20, 2023, following the discovery of a small leak on a stainless-steel coil used for plant monitoring. The licensee decided to shut down the reactor to make repairs, after which the reactor was brought back to power. CNSC staff oversight included inspections in the Main Control Room (MCR) and attendance of outage meetings. (Page 109)

- As this type of event is of interest to the public, this community stakeholders were promptly notified of this event and was provided with details of it and steps to address it. This is consistent with the public expectation on transparency.

5. Fuel Design - A total of 4 defects were confirmed which is more than the CNSC expected defect rate of one defect per unit per year. All the defects are judged to be due to foreign material interaction with the fuel elements. (P.111)

- This writer was surprised and concerned to read that there were 4 defects listed on page 111 which is more than the CNSC expected defect rate of one defect per unit per year. Specifically, in regards foreign material interaction with the fuel element.
- This writer acknowledges that PLNGS inspection program identified this issue.

6. The critical deficient maintenance backlog was above the industry average (noting that the industry average improved in the last 5 years). (P. 112)

- This writer learned that the maintenance backlog was above the industry average – what action has the licensee put in place to address this backlog?

7. Aging Management (P. 113)

- Considering the age of this facility, not enough information is provided in this report that addresses how the licensee is managing its aging management program. This is a topic of public interest (Telegraph Journal January 9, 2025, Page A3). More detailed information should be included to demonstrate how the licensee is managing this issue.

8. Environmental Protection (P. 115)

- This writer was reassuring to learn that:
 - radiation doses to workers were below the regulatory dose limits\there were no exceedances of an action level listed in the licensee's RP program.
 - appropriate measures were in place to control occupational exposures and to keep doses ALARA.
 - actions were taken to control radiological hazards to protect workers.

Others

This writer would recommend that the ROR includes a section of an update on the safety related aspect of the Power Operating Licence Renewal activities noted in their renewal of their licence.

This writer would recommend that an update on the Discussion Paper for Regulatory Documents where member of the public is invited to participate as part of a public consultation process be included in the ROR. This writer participated as part of the public consultation process for the Proposals to Amend the Nuclear Security Regulations

Discussion Paper DIS-21-02. This writer is concerned that considering the importance of cyber and regular security threat in the world, the regulatory documents have not been updated or approved yet. Can this be raised for clarification and update from all nuclear facilities at the public meeting for ROR in February.

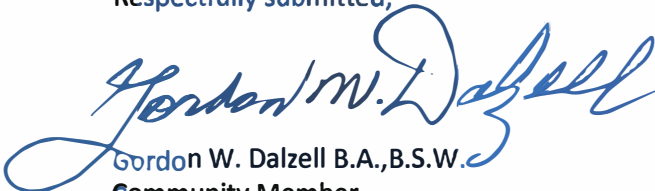
Conclusion

I continue to believe that all the nuclear power plants in Canada are safe and have the outmost confidence in the oversight work of the Canadian Nuclear Safety Commission members and staff. These public meetings play an integral role in addressing of the misinformation related to safety of nuclear power plants.

The 2023 report format is less detailed than in the past. These reports should include more detailed information in order to ensure the public is fully informed with all the relevant safety facts. Providing additional clarity and context will help the community better understand the situation and make well-informed decisions based on comprehensive, accurate data. It is in the public interest to do so.

This intervenor would also appreciate a written response to the questions and issues raised in this intervention.

Respectfully submitted,



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Community Member

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