



MEMORANDUM

NOTE DE SERVICE

To Candace Salmon
A Commission Registrar, CNSC

Security Classification

UNCLASSIFIED

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From
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Dr. Alexandre Viktorov Director General / Dire...

Signed by: Viktorov, Alexandre

Subject **CNSC Staff's Review of Bruce Power Inc. Request for Confidentiality in Relation to CNSC**
Objet **Staff CMD 26-H110 Reference Documents / Examen par le personnel de la CCSN de la**
demande de confidentialité de centrales nucléaires de Bruce Power Inc. concernant les
documents de référence du personnel de la CCSN CMD 26-H110

PURPOSE

The purpose of this memorandum is to provide CNSC Staff's comments to the Commission regarding the matter of Bruce NGS A and B (Bruce Power) request to protect from public disclosure the document submitted in the request for confidentiality:

Central Maintenance Facility: Evidence for the Record for Commission Approval

The CNSC Registry subsequently requested that CNSC staff provide their advice to the Commission on the Matter.

DISCUSSION

To CNSC staff's knowledge, Bruce Power's documents provided in the confidentiality request have not been made available elsewhere publicly. The documents listed in Table 1 have consistently been treated as confidential in CNSC staff's dealings with Bruce Power.

CNSC staff reviewed the documents and related details provided by Bruce Power. Bruce Power has requested that the entire content be kept confidential for certain documents, while requesting redacted



content of other documents. Relevant information, along with CNSC staff's comments, is included in Table 1.

CONCLUSION

CNSC staff have reviewed Bruce Power's request for confidentiality to assess whether the proposed request is reasonable and provide information in this memorandum to the Commission Registry.

Prepared by: Olga Shykinova, Senior Program Officer (CNSC)

Attachment: Table 1

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Canadian Nuclear Safety Commission



Table 1: Material subject to the request for confidentiality

	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
1.	BP-CORR-00531-06456, Attachments A and B	<input type="checkbox"/> Entire content <input checked="" type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input checked="" type="checkbox"/> Other (specify), and <input checked="" type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>These attachments contain technical information that Bruce Power consistently treats as confidential. In addition, it also contains some intellectual property and confidential information of a third party (other).</p> <p>The figures in the attachment include the arrangement, dimensions and design elements of the hot cell and target assembly and could reasonably be expected to prejudice Bruce Power's competitive position or result in financial loss to Bruce Power if publicized.</p> <p>A copy of the Item requested, with the figures redacted, has been prepared, to allow public understanding of the hot cell design and support the openness of the proceeding.</p>	<p>CNSC staff find that Bruce Power's rationale for withholding the specified content to be reasonable.</p> <p>It is CNSC Staff opinion that the redacted version of this document is reasonable.</p>
2.	BP-CORR-00531-06926, Enclosure 1	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is:	<p>This report contains detailed technical information related to the design, safety analysis and operational assumptions for the hot cell activities associated with Iu-177 production. In addition, it also contains intellectual</p>	<p>CNSC staff find that Bruce Power rationale to withhold the entire document is reasonable.</p>



	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
			<input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input checked="" type="checkbox"/> Other (specify), and <input checked="" type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>property or confidential information of a third party (other).</p> <p>This information is consistently treated as confidential due to its commercial sensitivity, technical specificity and use intellectual property. Disclosure could reasonably be expected to provide insight into site-specific vulnerabilities, prejudice Bruce Power's competitive position or result in financial loss.</p> <p>A non-confidential summary of the Item requested has been prepared to describe the purpose, scope, and key conclusions of the safety analysis. The summary provides sufficient information to allow public understanding of the hot cell analysis and support the openness of the proceeding.</p>	<p>It is CNSC staff's opinion that the summary for this document is reasonable.</p>
3.	BP-CORR-00531- 07239, Attachment A and B	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial,	<p>These attachments contain suggested changes to the Licence Conditions Handbook, which will be considered by CNSC staff. Draft information is consistently treated as confidential by Bruce Power since it can be misleading when released before it is finalized.</p>	<p>CNSC staff find that Bruce Power rationale to withhold the entire document is reasonable.</p> <p>It is CNSC staff's opinion that the summary for this document is reasonable.</p>



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			<input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input checked="" type="checkbox"/> Other (specify), and <input checked="" type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	This topic is addressed in sufficient detail through evidence for the record that is not treated as confidential, including the overall description of the impacts on safety and control areas in both Bruce Power's and CNSC staff Commission Member Documents.	
4.	BP-CORR-00531-07239, Enclosures 1, 2 and 3	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input checked="" type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input type="checkbox"/> Other (specify), and <input checked="" type="checkbox"/> Is consistently treated as confidential and the person	These documents form part of Bruce Power's management system and contain commercially sensitive information regarding internal methodologies, program implementation, and business practices. This information is consistently treated as confidential by Bruce Power. Disclosure of this information would provide detailed insight into Bruce Power's internal approaches and could reasonably be expected to prejudice Bruce Power's competitive position, without contributing meaningfully to public understanding of safety or regulatory	CNSC staff find that Bruce Power rationale to withhold the entire document is reasonable. It is CNSC staff's opinion that the summary for this document is reasonable.



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			affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	compliance. Non-confidential summaries have been prepared to describe the purpose, scope and outcomes of the governance. These summaries provide sufficient information for the public to understand how safety and regulatory requirements are met.	
5.	BP-CORR-00531-07336, Enclosure 1	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as clearly identified in the document	<input type="checkbox"/> The information involves national or nuclear security elements <input type="checkbox"/> The information pertains to Indigenous Knowledge The information is: <input type="checkbox"/> Financial, <input type="checkbox"/> Commercial, <input type="checkbox"/> Scientific, <input checked="" type="checkbox"/> Technical, <input type="checkbox"/> Personal, or <input checked="" type="checkbox"/> Other (specify), and <input checked="" type="checkbox"/> Is consistently treated as confidential and the person affected has not consented to disclosure. Or: <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s)	<p>This report contains detailed technical information, including technical methodologies, modelling approaches, and software applications (e.g., ORIGEN-S and ORCA) and details design, material inventories and scenarios specific to Bruce Power's site and operations. In addition, it also contains intellectual property or confidential information of a third party (other).</p> <p>This information is consistently treated as confidential due to its commercial sensitivity, technical specificity and use third-party intellectual property. Disclosure could also reasonably be expected to provide insight into site-specific vulnerabilities, prejudice Bruce Power's competitive position or result in financial loss.</p>	<p>CNSC staff find that Bruce Power rationale to withhold the entire document is reasonable.</p> <p>It is CNSC staff's opinion that the summary for this document is reasonable.</p>



	Item Name	Portion(s) covered by the request for confidentiality	Reason for Request	Applicant's Rationale	CNSC Staff Comments
				Non-confidential summaries of the Items requested have been prepared to describe the purpose, scope, and key conclusions. These summaries provide sufficient information to allow public understanding and support the openness of the proceeding.	