



October 9, 2018

VIA EMAIL

Mr. Brian Torrie  
Canadian Nuclear Safety Commission  
280 Slater Street  
P.O. Pox 1046, Station B  
Ottawa, ON K1P 5S9

Dear Mr. Torrie:

**Re: Orano Canada Inc. Comments on CNSC REGDOC 2.1.1 – Management System**

**Orano Canada Inc.**

817 45th Street West  
Saskatoon SK S7L 5X2  
Tel.: +1 (306) 343-4500

Orano Canada Inc. (Orano) is committed to being best in class by achieving objectives that continually improve the performance and effectiveness of its Integrated Management System (IMS). We have established an IMS that applies to the entire organization, its employees, and contractors. Attached are Orano's comments on draft REGDOC 2.1.1 for your consideration.

Please contact me by phone: 306.343.4021 or email: [richard.schewaga@orano.group](mailto:richard.schewaga@orano.group) if you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Schewaga", with a long horizontal line extending to the left.

Richard Schewaga  
Manager, Management Systems and Organizational Excellence

cc: Dale Huffman – Orano  
OCI Regulatory Distribution



To: Mr. Brain Torrie – Canadian Nuclear Safety Commission  
Re: Orano Canada Inc. Comments on CNSC REGDOC 2.1.1 – Management System  
October 9, 2018  
VIA EMAIL

### **Orano Comments on CNSC REGDOC 2.1.1 – Management System**

1. Preface – The statement “This regulatory document does not duplicate the generic requirements of CSA N286-12. However, it provides more specific direction for those requirements.” specifies the content as more specific direction for licensees, and in so doing, makes the information a de facto requirement. This statement also contradicts other sections within the document that indicate the content is to be utilized as “guidance” and “information”. The last sentence of this statement should be removed from the document.
2. Purpose – Section 1.1 states “The purpose of this document is to provide information.” This would be the agreed upon approach, given the joint commitment, collaboration, and efforts of industry and the CNSC at the CSA to produce the N286-12 Standard.
3. Scope – The scope specifies that the information in this document pertains to Uranium Mines and Mills (UMM). However, there are many topics and references to other standards contained within that currently do not apply to UMM, such as:
  - a. Leadership commitments (*CAN/CSA ISO9001:16* and *IAEA GSR Part 2*)
  - b. Counterfeit, fraudulent and suspect items
  - c. Configuration management (*CSA N286.10-16*)
  - d. Software quality assurance (*CSA N286.7-16*)

By including these topics and references to standards that are in addition to the current UMM requirements, even as information, they may be perceived as requirements.

4. Radiation safety oversight – This topic provides a subject matter and level of detail that seems out of place within this document related to Management System. To avoid confusion and the overlapping of requirements between multiple CNSC safety and control areas, it is suggested to remove this entire section from this document and place it within another more appropriate document related to radiation protection.