

**From:** Paul Young  
**Sent:** October-19-18 10:59 AM  
**To:** Lahaie, Pierre (CNSC/CCSN)  
**Subject:** Comments on Reg Doc

Hi Pierre,

I don't have my computer with me, and I am not sure that you can still accept these comments officially, however fortunately in my carry on case was a mark up that had from before the TC. I fluffed those up and here they are. I did not include any of the niggly things because I am sure that others have:

I have confined my comments to be from the viewpoint of someone knowledgeable in N286-12. I have Other comments of a minor nature that are form an individual point of view that are relatively minor and I am certain would be duplicate to others so I did not submit these. Four comments are provided.

### **Comment 1**

I wish to comment the CNSC staff in working within the framework of existing documents that have been created by the industry and successfully implemented, rather than create a new document. This is important because:

1. it prevents the duplicity of having parallel documents on the same subject which leads to contradictory ideas, divergence over time and duplication of effort.
2. It allows for inclusion on new ideas and experience without requiring the regulatory document to be revised.
3. It allows for more buy in as generally the source document (in this case N286-12) were created with the regulators, licensee's and suppliers and representatives of the public interest all at the table.

### **Comment 2**

Paragraph 3.1 should be modified to remove the second paragraph and reference to ISO9001 and GSR3 and aligning the bullets to the first paragraph because all of the bullets (with some word-smithing) align well with N286-12. I think that this is important because:

1. ISO 9001 and GSR3 are not widely used as implementing guidance of Canadian Licensees.
2. N286 takes great strides to harmonize with ISO9001 but not vica versa, therefore you are creating confusion by referencing it.
3. ISO9001 is generally held in poor esteem by the Class 1A licensee community and its reference.
4. Why would we give other documents credit for Canadian work. N286 fully addressed the ideas contained in the bullets.

### **Comment 3**

I would take out specific reference to N299 in the second Paragraph 3.3. Rather I would say "Documents have been created by industry to lay out the management systems requirements for suppliers, some of these are contained in international, regional or national standards while others are created through industry support groups. These requirements are passed down by the licensee through contracts." My reasoning here is:

1. N299 does not apply beyond Nuclear Power Plant suppliers.

2. N299 also only applies to Quality. Many other documents are used to communicate expectations to suppliers beyond quality.
3. N299 is in its very early stage of implementation.

**Comment 4**

I am puzzled why we need a paragraph on CFSI at all and if we do that it is so long. CFSI is a flavour of the decade based on the use of experience and corrective action of a well implemented N286 program. About every 10 years a very serious event occurs or issue arises that requires hardening certain aspects of the management system. This is part of the game and is a tremendous success of the implementation of management systems. Previous flavours of decades have included the addressing major issues such emergency preparedness (Browns Ferry and TMI), Foreign Material Exclusion (Bruce Lead Blanket), Configuration Management (various) and Human Performance. The problem is we think that we need to call these issues out separately and create a new program when really what it is just significant issues that have bubbled up through the use of experience and corrective action program.

**Comment 5**

I think Section 3.5 is misplaced, incomplete and mislabeled. First contractors is the wrong jargon and should be referred to as supplier of service. But more importantly the list here is incomplete as to what suppliers need to do and what the licensee needs to ensure they do it. It is not a new dimension that needs to be managed any differently than is in the current management system. Although it may be a fact that there has been an increase in the use of suppliers to do work that was traditionally done by the licensee, suppliers have always been a major player. The controls are those listed interestingly under the section on CFSI (the six bullets without any mention of CFSI). What I would do is shorten the whole section 3, take out the specific references in the sub sections and list the controls to achieve the desired results. i.e. Implement N286.

Oh by the way Counterfeit and Fraudulent and Substandard is not just confined to the supply chain. It is alive and well within the licensee shop as well. Anyway, I hope this helps and is not too late.