

November 8, 2016

NK21-CORR-00531-13202
NK29-CORR-00531-13689
NK37-CORR-00531-02655

Mr. B. Torrie
Director General, Regulatory Policy Directorate
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
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Dear Mr. Torrie:

Bruce Power comments on REGDOC-3.1.2, Reporting Requirements for Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills

The purpose of this letter is to comment on this document, which sets requirements and guidance for reports and notifications that licensees of Class I nuclear facilities and uranium mines and mills must submit to the CNSC.

Its scope is very similar to *REGDOC-3.1.1, Reporting Requirements for Nuclear Power Plants*, which Bruce Power commented on extensively during its own development period. The attached list of comments is based upon our operating experience with *REGDOC-3.1.1* and a collaborative review of this particular draft with our industry peers. Let me highlight two key points that emerged from this collective review:

- It is unclear what value is added by the requirement for an Annual Compliance Monitoring Report (Section 3) in *REGDOC-3.1.2*. Most requirements are similar to other required reporting.
- In some cases, it is recommended that the reporting timelines for the unscheduled reporting (Table A.1) be based on the significance of the event. This allows the administrative burden of reporting to be managed as applicable.

As always, we appreciate the opportunity to provide feedback and share our experiences to help the CNSC develop better regulatory documents. If you require further information or have any questions regarding this submission, please contact Mr. Maury Burton, Manager, Regulatory Affairs, at (519)-361-2673 extension 15291, or maury.burton@brucepower.com.

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Mr. B. Torrie

November 8, 2016



Yours truly

A handwritten signature in blue ink, appearing to read 'F. Saunders', written in a cursive style.

for Frank Saunders
Vice President Nuclear Oversight and Regulatory Affairs
Bruce Power

cc: CNSC Bruce Site Office (Letter only)
Mr. K. Lafrenière - CNSC, Ottawa
Ms. K. Owen-Whitred – CNSC, Ottawa

Attach.

**Bruce Power comments on REGDOC-3.1.2,
Reporting Requirements for Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills**

Document section / excerpt of section	Industry issue	Suggested change (if applicable)	Major Comment/ request for clarification ¹	Impact on industry if major comment
1. General	The Annual Report contents, as outlined in Section 3, are very similar to that required for a licence application and adds significant burden. This is contrary to the direction to reduce unnecessary burden. REGDOC-3.1.1 was developed to provide performance data for regulatory oversight while making use of existing practices. Reports should be limited to existing performance reporting.	Industry would be happy to work with other stakeholders and CNSC to identify appropriate reporting requirements. Remove requirements for future plan, changes and facility descriptions. The Annual Report should be reconsidered to focus on performance. Once established, industry expects the content requirements to remain unchanged, except during the REGDOC revision process.	MAJOR	As written, this requires licensees to provide essentially a new application for each facility each year. This is a significant burden on licensees, with no improvement to safety or performance. Modifications to systems, documents etc. are provided to the regulator through other mechanisms, including the LCH notification process. Duplicate reporting adds significant burden for no improvement in safety. This will ensure consistency between licensees and regulatory certainty.
2. General	In some cases, all the reporting required will be addressed in the initial report. However, if a full report is required, it should be submitted 60 days following the submission of the preliminary report.	Suggested change: CNSC should review Table A To change, where required, the column Full Report in the table to, "Within 60 days after becoming aware of the event (if required.) "	MAJOR	Adds administrative burden with no benefit.

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3. General	Quoting sections from many other regulatory documents and acts adds confusion to the document. The reader must carefully review all of the referenced documents to understand the intent of each section and sections from Appendix A Table A. Since the sections are often partially quoted, they will be interpreted differently by different readers and increases the likelihood that information is taken out of context.		Clarification	
4. Preface, page j, 6th paragraph: "Licensees are expected to review and consider guidance; should they choose not to follow it, they should explain how their chosen alternate approach meets regulatory requirements. An applicant or licensee may put forward a case to demonstrate that the intent of a requirement is addressed by other means and demonstrated with supportable evidence."	Guidance is meant to be guidance. If the licensee is required to meet guidance criteria (even by other means), then it is a requirement, not guidance.	Change to: "Licensees are expected to review and consider guidance. they should choose not to follow it; they should explain how their chosen alternate approach meets regulatory requirements. An applicant or licensee may put forward a case to demonstrate that the intent of a requirement is addressed by other means and demonstrated with supportable evidence. "	MAJOR	Licensees note that a similar statement appears in all REGDOCs. It puts an unreasonable onus on licensees to demonstrate not just how requirements are met, but also how guidance is met.

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5. Preface, paragraph 4 This document will be used to assess new licence applications for nuclear facilities and activities.	It is not clear how CNSC staff might use this document for assessment of new licence applications or how evaluations of specific problems or data during the review of applications will be conducted.	Delete	Clarification	
6. Table of Contents	Appendix A does not sufficiently reflect the hierarchical structure of Table A.	Expand Table of contents – Appendix A accordingly.	Clarification	
7. 1.1 para 2	The requirement to report is unclear as to safety significance	Requirement to report situations or events of higher safety significance...	Clarification	
8. 1.2 Scope, page 1 First paragraph: “This regulatory document incorporates and clarifies requirements and clarifies requirements found in the NSCA and the regulations...”	These reporting requirements go beyond just incorporating and clarifying the existing requirements.	Suggest using the wording from REGDOC-3.1.1 “...incorporates and expands upon the requirements...” which is more accurate.	Clarification	
9. 1.3 bullet 3	Missing provisions in the Act for extension of submission time for reports	Add “section 44 of the NSCA and section 29, 30 and 31 of the GNSCR contain provisions where the submission time for full reports can be extended by the terms of a licence condition.”	Clarification	

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10.	1.3, page 2, last 2 bullets Re. subsection 17(1) and paragraph 19(2)(d) of the Class II Nuclear Facilities and Prescribed Equipment Regulations	Text is irrelevant to this document.	Delete	MAJOR	Unnecessary administrative burden since this document is specific to Class I facilities.
11.	1.3, page 3, last point subsection 7.5(4) of the Nuclear Security Regulations states that "...; in addition, sections 21 and 36 and subsection 44(2) stipulate other situations requiring notification	Section 7.3 of the Nuclear Security Regulations indicates that "Sections 7.4 – 38 apply in respect of high-security sites." While Appendix A Table A makes reference to applicability, the scope section does not limit how this regulation is applied. In effect the NSR are paraphrased in this document which could allow the requirement to be taken out of context.	Remove the bullet from section 1.3 or add disclaimer on limitation of scope for the reference.	MAJOR	If not modified, sections of the Nuclear Security Regulations can be applied to facilities and sites they were not intended for.
12.	Section 2, page 3, 1a	Terminology revision	Replace "an event or a situation" with "an event or a situation as set out in Table A of Appendix A".	Clarification	
13.	Section 2, page 4 #4	Why is 'immediate reporting' applied to all types of events?	Replace reporting timelines by safety significance, same as in REGDOC 3.1.1 (section 2 – items 1-8, and 10)	MAJOR	Administrative burden on licensee and regulator due to immediate response requirement.
14.	S2 Guidance, page 4	Significance level is not addressed, facility specific reports are unclear (scheduled/non-scheduled/annual/ quarterly)	"Make consistent with guidance from REGDOC 3.1.1	MAJOR	Inconsistency given the risk profile of the facility with existing LCH/licence /REGDOC 3.1.1.

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15. Section 2, page 4, Guidance para. 1	Terminology revision.	Replace "licensing specialist" with "project officer"	Clarification	
16. Section 2, Guidance paragraph 3, page 4: In addition to the list above, the licensee may be required to file facility-specific reports, as described in their licence conditions handbook (LCH).	Some industry LCHs contain a comprehensive table of situations, events or dangerous occurrences which require reporting by the licensee to the CNSC. If the table will not be replaced with this REGDOC in the LCH, then it does not seem this REGDOC is necessary.	REGDOC 3.1.2 should supersede all other current reporting requirements in the current regulatory framework.	MAJOR	Duplicate burden and unnecessary inconsistency between licensees.
17. Section 2, page 4, Guidance, last bullet	Terminology revision.	Replace "an unplanned spill or release" with an "unplanned spill or release that is reportable under provincial or federal legislation"	Clarification	
18. Page 5, Guidance, 1 st full paragraph" "Licensees using this option..."	Redundant - the requirements are captured in LCH/Licence. The REGDOC should specify the requirement which the licensee will define how compliance is achieved	Delete entire paragraph	MAJOR	Accountability should remain with the licensee.
19. Section 2, page 5, Guidance, 2 nd last paragraph	Public disclosure: some reportable events have no public interest element and should not be considered as an "input to their public disclosure protocol".	Delete paragraph, licensees should adhere to their own public information programs.	MAJOR	Administrative burden on licensee with no benefit. Expanding on licensing requirements
20. Section 2, page 5, Guidance, 2 nd last paragraph	Public disclosure should not be required until after it is determined that an event is reportable.	Revise to require to defer any public disclosure as per the licensee public disclosure protocol	MAJOR	Administrative burden on licensee with no benefit. Expanding on licensing requirements

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<p>21. Section 2, page 5, Guidance, last paragraph Final paragraph: "Each report should be unclassified and ... Any information considered classified, protected, proprietary or personal should be submitted in accordance with the CNSC's <i>Guidance Document on Confidential Filings.</i>" AND Page 5 S3, Item 1</p>	<p>The Guidance Document on Confidential Filings only applies to submissions made to formal Commission hearings for licensing decisions. It doesn't apply to reports generated by the REGDOC.</p>	<p>Delete this reference</p>	<p>MAJOR</p>	<p>As written, this requirement may lead to an inadvertent public disclosure of classified, protected, proprietary or personal information. Creates confusion to refer to a document which has no application.</p>
<p>22. Section 2, page 5, Guidance, 3rd last paragraph</p>	<p>"If the licensee determines..."</p>	<p>Change the first sentence "a full report may not be necessary" to "a full report is <i>not necessary</i>". Delete second sentence.</p>	<p>Clarification</p>	

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23. Section 3	It is unclear whether Annual Reports provided by a licensee pursuant to REGDOC 3.1.1 can take the place of content required by draft REGDOC 3.1.2. For example, for licensees with multiple facilities under separate licences at a site, it is unclear whether the licensee can prepare a single report, for example a single Annual Environmental Report.	Revise the Guidance on page 6 to state, "for sites with multiple facilities (under the same or different <u>CNSC</u> licences) or a licensee possessing a licence with multiple locations, the licensee may submit the information <u>through other required reports applicable to the SCA</u> , or in a single consolidated annual compliance report.	MAJOR	Providing duplicative information serves not benefit, and increases the reporting burden placed on licensees. It may also lead to a configuration management issue.
24. Page 5 Section 3 "The licensee shall submit an annual compliance monitoring report..."	The licensee should have the flexibility of providing compliance monitoring in a format and frequency other than the annual report.(i.e. existing quarterly reports from the licensee may satisfy the requirement for compliance monitoring)	"Licensee shall submit compliance monitoring report(s)..."	Clarification	
25. Section 3, Page 5, Item 2 "Sufficient details to provide CNSC staff with information to verify ..."	Vague statement.	Further discussions between industry and CNSC are required to clarify requirements	MAJOR	Unclear requirements leading to inconsistencies in reporting.

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26. Section 3, Page 6, Paragraph after item 3 "Each annual compliance monitoring report shall act as a stand-alone document. If information from any previous annual compliance monitoring report is needed for completeness, the licensee shall repeat it to the appropriate level of detail."	Second sentence is a duplication of effort.	Delete the second sentence	Clarification	
27. Section 3, page 6, Guidance, paragraph 2	Not required	Delete paragraph	Clarification	
28. Section 3, page 6, Guidance, paragraph 3	This paragraph applies to all notifications and reports and not just the annual compliance monitoring report.	Move to Section 2 Reporting Requirements	Clarification	
29. Section 4, page 6	Current licensees have differing reporting requirements in their LCHs. This REGDOC should supersede all the requirements in the LCHs.	This REGDOC should supersede all the requirements in the LCHs	MAJOR	Duplicated burden and unnecessary inconsistency between licensees.
30. Section 4.1, page 6, Introduction	A preliminary report or immediate notification of a situation or event, or of a dangerous occurrence as stipulated in section 35 of the PTNSR 2015, shall contain...	Add the words "...as available"to the end of the first paragraph.	Clarification	

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31. Section 4.2, page 7, Guidance: "Licensees should include information that allows the report to be reviewed efficiently; for example: <ul style="list-style-type: none"> - identify updates and new or additional information from that provided previously - identify any further missing information and the date that the missing information will be provided to the CNSC - Identify the target completion date for each action that the licensee proposes to take to re-establish normal operations or to prevent a recurrence." 	Bullets 1 and 3 were determined to be unnecessary during the development of REGDOC-3.1.1.	Remove bullets 1 and 3	MAJOR	As written, the inclusion of these bullets is inconsistent with REGDOC-3.1.1 and could generate regulatory confusion/uncertainty.
32. Section 4.2, page 7, item 11	This action is already achieved through the public information program of the licensee on an as needed basis.	Delete. Not all the reportable events are required to be disclosed to the public.	MAJOR	If not modified, this will set requirements in excess of the Public Information and Disclosure RD/GD document.

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33. Section 4.3, page 8 Action Level Reports	Action Level Reports are discussed in Section 4.3 and Table A.1 #13.	Delete Section 4.3.	Clarification	
34. Page 9, Appendix A introduction	Why is 'immediate reporting' applied to all types of events? Events with low safety significance should not require immediate reporting	Replace reporting timelines by safety significance, same as in REGDOC 3.1.1 (section 2 – items 1-8, and 10)	MAJOR	Administrative burden on licensee and regulator due to immediate response requirement.
35. Table A throughout	Timing for preliminary report does not distinguish between significant and non-significant events	Specify: High safety significance situations or events require an immediate preliminary report. Where reporting of lower significance events is required, allow for 5 day reporting	MAJOR	Adds administrative burden with no benefit
36. Table A throughout	For Full Reports: <ul style="list-style-type: none"> In some cases, there may no additional information available or required. The due date for submission of the full report should be based on the date the preliminary report was submitted. 	Suggested change: For most situations, change the full report requirement in the table to "Within 60 days (if required)"	MAJOR	Adds administrative burden with no benefit

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37.	Table A: No. 1	Additional guidance is provided in REGDOC-3.1.1 on a non-compliance situation. This should be included. This section of the REGDOC should be consistent with REGDOC 3.1.1.	Add as 1.a: Guidance Regulations made pursuant to the NSCA, orders of the CNSC, a designated officer or an inspector, and licence conditions have their origins from the NSCA. Therefore, it is understood that a contravention of a regulation made pursuant to the NSCA, of an order or of a licence condition is a contravention of the NSCA.	Clarification	
38.	Table A: No. 1	Requirements of GNSCR 9(4) missing.	Add as 1.b : General Nuclear Safety and Control Regulations (GNSCR): 9. (4) Every person who carries on an activity without a licence in accordance with subsection (1) or (2) shall immediately notify the Commission of that fact.	Clarification	

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<p>39. Table A: No. 3a) A contingency plan may include: i. any situation or event (flood, fires, earthquakes, etc.) that requires the implementation of an emergency plan, or the use of any abnormal operating procedures or emergency operating procedures, or the mobilization of resources in response to the situation or event ii. the occurrence of any unusual external events (flood, fires, earthquakes, etc.) at or near the site that require further inspection to verify its effect on any structures, systems and components</p>	<p>Subsection i. indicates any situation or event. However, subsection ii characterizes the same examples as “unusual external events.” For REGDOC-3.1.1, this type of reporting has been discussed and clarification has been agreed upon. Suggest revising i. to be consistent with the REGDOC-3.1.1 requirements that are to be included in the next revision of the Interpretations Document.</p>	<p>Replace i. with:</p> <p>Reportable situations include:</p> <ul style="list-style-type: none"> • Activation of the site nuclear emergency plan, or • Use of emergency operating procedures (including evacuation of an area, meeting the entry conditions to an AIM, etc.), or • Sounding emergency alarm, mobilizing the site Emergency Response Team (ERT) or offsite emergency responders in response to an unexpected occurrence that creates a hazard to the safe operation of the nuclear power plant, to the environment or to the health and safety of persons. 	<p>Clarification</p>	
<p>40. Table A: No. 3a) and 3b)</p>	<p>Timing of reports should depend on significance level of situation or event</p>	<p>Change to: immediate for significant or 5 business days for low significant levels.</p>	<p>MAJOR</p>	<p>Adds administrative burden with no benefit</p>

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41. Table A: No. 3a) and 3b)	<ul style="list-style-type: none"> For some events there may no additional information available or required. The due date for submission of the full report should be based on the date the preliminary report was submitted. 	Change full report in the table to "Within 60 days (if required)".	MAJOR	Adds administrative burden with no benefit
42. Table A: No. 4	Add in geographical limits for site boundary.	Guidance Any death within the exclusion zone or the licensed area (whichever is larger) or as defined in the LCH, regardless of cause, or any death resulting from an injury or illness, regardless of time intervening between injury or illness and death, will be reported.	Clarification	
43. Table A: No. 5	60 days is required for full report	Add "(if required)" and delete "after becoming aware of the event".	Clarification	
44. Table A, No. 8	Guidance for s. 29(1)(f) of GNSCR: lists enumerated events that may have no serious adverse effects.	Remove enumerated list.	MAJOR	If intention is to require reporting of all enumerated events then it would create administrative burden; if the intention is to only require reporting of events with a serious adverse effect then it creates uncertainty.
45. Table A: No. 9	Title of the section includes Class II equipment	Is it applicable?	Clarification	

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46. Table A: No. 9 a) and b)	60 days is required for full report	Add "(if required)" and delete "after the day on which the licensee becomes aware of the event".	Clarification	
47. Table A: No. 9 c)	Concerns Class II equipment	Is it applicable?	Clarification	
48. Table A: No. 9	In many cases, these sources or devices are held under a separate licence and may not be included under the Class I or UMM licence. Reporting for devices must be done in accordance with the appropriate licence and Nuclear Substance and Radiation Devices Regulations	Clarify that these reporting requirements only apply if these are held under the Class I or UMM licence	MAJOR	Adds administrative burden with no benefit
49. Table A: No. 10	No reference to an appropriate clause in the NSCA or Regulations is provided. This should Reference NSCA 24(5).	Add applicable section(s) of the NSCA or regulations made under the NSCA: 24. (5) A licence may contain any term or condition that the Commission considers necessary for the purposes of this Act, including a condition that the applicant provide a financial guarantee in a form that is acceptable to the Commission.	Clarification	
50. Table A: No. 11 Specific reporting provisions The licensee shall report on all other situations or events that are not	This section acts as a catch all clause. Clarification needed to make it subjective to the opinion of the licensee.	Change wording of "Specific reporting provision" to add: <i>Subject to the opinion of the licensee</i> , the licensee shall report on all other situations or events that are not otherwise specified in this document	MAJOR	Adds administrative burden and uncertainty with no benefit

Document section / excerpt of section	Industry issue	Suggested change (if applicable)	Major Comment/ request for clarification ¹	Impact on industry if major comment
otherwise specified in this document but can be reasonably assumed to be of regulatory interest, including notifications and situation or event reports to other regulatory agencies within the scope covered by the objects of the Commission (see section 9 of the NSCA).		but can be reasonably assumed to be of regulatory interest, including notifications and situation or event reports to other regulatory agencies within the scope covered by the objects of the Commission (see section 9 of the NSCA).		
51. Table A: No. 10 & 11	Timing of reports should depend on significance level of situation or event	Change to: immediate for significant or 5 business days for low significant levels. Full report due in 60 days (if required)	MAJOR	Adds administrative burden with no benefit
52. Table A: No. 12a; Full Report column	If a full report is required, it should be submitted 60 days following the submission of the preliminary report.	Delete "after becoming aware of the event" and add "if required".	Clarification	
53. Table A: No. 12b	The guidance has a typographic error. Refers to a section that does not exist in this table	Fix error	Clarification	
54. Table A, No. 13a	Reporting times for uranium mines and mills action levels are set out in code of practice.	Add the following guidance: <i>Uranium mines and mills licensees are to follow the reporting procedures referenced in the environmental protection program code of practice if an action level is reached (refer to UMMR 4(2) for the contents of a</i>	MAJOR	Leads to uncertainty in requirements

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55. Table A: No. 14	REGDOC-3.1.1 Table A.1 #22 clarifies that single missed sample where justified is not considered failure to monitor.	<i>proposed code of practice</i> Add to Guidance: For item b), a failure to collect an individual sample where justified is not considered failure to monitor. For the purpose of event reporting, failure to monitor is more appropriately considered in the context of programmatic failure.	Clarification	
56. Table A: No. 14	Reporting time should be based on significance level of the environmental impact	Change to: immediate for significant or 5 business days for low significant levels. Full report due in 60 days (if required)	MAJOR	Adds administrative burden with no benefit
57. Table A: No. 15	In many cases, these sources or devices are held under a separate licence and may not be included under the Class I or UMM licence. Reporting for devices must be done in accordance with the appropriate licence and Nuclear Substance and Radiation Devices Regulations	Clarify that these reporting requirements only apply if these are held under the Class I or UMM licence	MAJOR	Duplication of reporting requirements
58. Table A: No. 15	A requirement for Class II Facilities should not be included in this document.	Delete requirement	MAJOR	Duplication of reporting requirements
59. Table A: No. 16	60 days is required for full report	Add "if required" and delete "after becoming aware of the event".	Clarification	Adds administrative burden with no benefit
60. Table A: No. 16 and 17	Reporting is not required where there is not a hazard to health safety and security of persons as found in REGDOC-3.1.1 A27	Add to guidance: Immediate reporting is required only where a hazard to the health, safety and security of persons and the	MAJOR	Adds administrative burden with no benefit

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			environment or to the security of the nuclear facility exists.		
61.	Table A: No. 17	Timing of reports should depend on significance level of situation or event	Change to: immediate for significant or 5 business days for low significant levels. Full report due in 60 days (if required)	MAJOR	Adds administrative burden with no benefit
62.	Appendix B	The guidance is too detailed For example: Significant future activities or financial guarantee reporting should not be included in the Annual Compliance Monitoring report.	Remove the section from the Appendix. Make it more general and consistent with licensees LCH requirements.	MAJOR	Adds administrative burden with no benefit
63.	Appendix B	The guidance is too detailed See general comment questioning the need for an annual report		MAJOR	Adds significant administrative burden with no benefit
64.	Appendix B, p. 42	Annual Compliance Monitoring Report sample includes analyses of five year trends in effluent and environmental monitoring results annually. This is provided in the EPRs. See general comment questioning the need for an annual report.	Remove reference to five year trend analysis.	MAJOR	It would create significant costs to perform the in-depth analysis for effluent and environmental trends carried out in accordance with CSA N288 series on an annual basis.

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65. Glossary	The definition of 'safety significance' conflicts with the definition in the International Atomic Energy Agency's (IAEA's) document SF-1, Fundamental Safety Principles [IAEA Safety Standards Series, 2006] where the term is restricted to radiation risks.	Remove reference to the IAEA SF-1	Clarification	