

From: CANNON Steve(S) - BRUCE POWER

Sent: November-20-15 9:38 AM

To: Torrie, Brian (CNSC/CCSN); Consultation / Consultation (CNSC/CCSN)

Cc: BURTON Maury(MP) - BRUCE POWER

Subject: Comments regarding Discussion Paper DIS-15-02: Review of CNSC Documentation on the Security of Nuclear Material

NK21-CORR-00531-12497

NK29-CORR-00531-12920

NK37-CORR-00531-02496

Mr. Torrie,

The purpose of this email is to provide comments from Bruce Power and requests for clarification on Discussion Paper DIS-15-02: "Review of CNSC Documentation on the Security of Nuclear Material."

Bruce Power supports the CNSC's efforts to better match industry terminology and insert formatting changes to improve flexibility and electronic submissions in both G-208, Transportation Security Programs for Category I, II or III Nuclear Material and G-274 Security Programs for Category I or II Nuclear Material or Certain Nuclear Facilities.

With regard to specific recommended changes in the Discussion Paper, Bruce Power:

- Suggests minor wording changes in DIS-15-02, 2.2.3, Item 4, to permit reports prepared in accordance with G-274 and G-208 and which contain prescribed information to be submitted electronically using appropriate means of encryption.
- Suggests removing the use of 'shall' in these guidance documents.
- Requests clarification for DIS -15-02, 2.13, Bullet 3, regarding the use of satellite and global positioning systems for continuous tracking. Without knowing the nature of the guidance, we are unable to comment on its suitability. We are concerned that currently installed systems may not be compatible if G208 guidance is too prescriptive.
- Suggests the new section called "Vital areas," as described in DIS -15-02, 2.2.3.c, be specific to access control and delay as per section 14.1 of the Nuclear Security Regulations.
- Suggests the requirements for secure communication described in DIS -15-02 2.2.3 be documented at a very high level so licensees can implement the requirement in the most effective way for their organizations.

Kind regards

Steve

Steve Cannon