

February 15, 2017

File: NWMO-REG-00531-0204

## MR. BRIAN TORRIE

Director General
Regulatory Policy Directorate
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Torrie:

## NWMO Comments on CNSC Discussion Paper DIS 16-05 Human Performance

The purpose of this letter is to provide NWMO comments on CNSC Discussion Paper DIS 16-05, Human Performance.

NWMO's main concern with this discussion paper is that this document puts the Human Performance Program as an overarching or integrated overview program. However, CSA N286-12 already directs the implementation of an integrated management system that has nuclear safety as an overarching priority.

NWMO thinks the human performance focus should be on safety critical tasks, and should be addressed through the existing management system elements. It would be useful to work with industry and other interested parties to improve definitions and expectations on key topics or factors that should be addressed.

NWMO appreciates the opportunity to comment on the discussion paper. If you have any questions regarding this submission, please contact me at (647) 259-3025.

Sincerely,

Paul Gierszewski

Director, Safety & Licensing

P. Gierszewski

cc. cnsc.consultation.ccsn@canada.ca