# External Commission Member Document (CMD) Template for Licensing Decisions

This template is intended for use in conjunction with the <u>Guide for Applicants and Intervenors</u> <u>Writing CNSC Commission Member Documents</u> when preparing a CMD to request a licensing decision.

To prepare a CMD for any other type of submission, please use the <u>External CMD Template for</u> <u>Other Submission Types</u>.

# To use this template:

- 1. Save your document.
- 2. Type over highlighted text with appropriate content (the highlighting should disappear as you type; otherwise, remove the highlighting manually).
- 3. Delete all instruction blocks (red text in grey-shaded blocks).
- 4. Delete this cover page.

**Note:** This template is designed for two-sided printing.

# [Original/Supplemental/Replacement]

# **CNSC Commission Member Document (CMD)**

**CMD:** [CMD Number Provided by CNSC Secretariat]

Date Submitted: [DD Month YYYY]

Reference CMDs: [Numbers of any related CMDs, or N/A]

# [Name of Licensee/Applicant]

[Public Hearing Day One/Public Hearing Day Two/One-Day Public Hearing/ Abridged Hearing/Public Meeting/Closed Session]

Scheduled for:

[Date of Hearing/Meeting]

# **Request for a Licensing Decision:**

Regarding:

[Subject of Request]

Submitted by:

Licensee/Applicant/Intervenor

# **Table of Contents**

- \*\*To update the Table of Contents at any time, take the following steps:
- 1. Select the first item in the existing Table of Contents to select the entire table.
- 2. Press **F9**.
- 3. When asked if you want to replace the existing Table of Contents, click "Yes".
- 4. Delete this instructional text when the document is complete.\*\*

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# **Executive Summary**

Provide an executive summary that gives meaningful insight into what is being presented to the Commission Tribunal, including information such as highlights, issues, and general conclusions, as appropriate.

[Provide executive summary]

# 1.0 Introduction

# 1.1 Background

Provide comprehensive, concise information that lays out the context of the case for the application and promotes the Commission's thorough understanding of information such as licensee activities, site size and location, proximity to other facilities, etc.

Visual aids, such as aerial photographs, are extremely helpful in this section.

# [Provide background]

# 1.2 Highlights

Explain the history of the application to give the reader a sense of how long the current application process has been going on. Provide information about such matters as:

- the overall purpose of the application
- when the application was submitted
- what is being requested
- whether the application is requesting any high-level changes (e.g., changes to the licence period)
- the licensing history
- overall improvements that have been made since the licence was last reviewed
- interim and planned improvements
- any other facts that will help support overall recommendations on the part of CNSC staff

### [Provide content here]

# 2.0 Business Plan

Use this section to discuss the "non-safety" factors of the application. This content should include any business considerations or other information that would give context to the licensed activity, to the facility, etc.

You may want to include an overview of the key elements of the business plan over the requested licence period. For example, discuss:

- factors that may cause a significant increase or decrease in productivity
- potential plans for refurbishment or life extension
- benefits of the proposal or activity described

the expected commercial life of the facility or activity

To facilitate document flow and continuity, the detailed plan itself can be included as an addendum to the main document.

[Provide content here]

# 3.0 Safety and Control Areas

The Commission expects any licensing decision CMD to address all 14 safety and control areas (SCAs) in the sequence used below. Each area should be addressed, even if only to explain why it is not relevant to the CMD. Communicate directly with CNSC staff to determine how each SCA applies to your specific facility or class of activity.

The kind of information to be provided for all SCAs is explained in sub-section 5.1 of RD/GD-379, *Guide for Applicants and Intervenors Writing CNSC Commission Member Documents*. There is standard text that appears for each SCA (as found in the guide) and SCA-specific guidance for each.

For each SCA, take the following steps:

- 1. If it is relevant to the CMD, delete the first line of text and provide content for the related sub-sections.
- 2. If it is **not** relevant, provide an explanation as to why it is not relevant and delete the related sub-section placeholders.

# 3.1 Management system

#### SCA definition:

Covers the framework that establishes the processes and programs required to ensure an organization achieves its safety objectives, continuously monitors its performance against these objectives, and fosters a healthy safety culture.

This SCA is not relevant to the CMD. [Explain]

# 3.1.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

For the management system SCA, this sub-section should include material such as:

- organizational chart(s)
- management structure
- key management documents related to safety

# [Provide content here]

# 3.1.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

# [Provide content here]

# 3.1.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

### [Provide content here]

# 3.1.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

#### [Provide content here]

#### 3.1.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

[Provide content here]

# 3.2 Human performance management

#### SCA definition:

Covers activities that enable effective human performance through the development and implementation of processes that ensure a sufficient number of licensee personnel are in all relevant job areas and have the necessary knowledge, skills, procedures and tools in place to safely carry out their duties.

This SCA is not relevant to the CMD. [Explain]

# 3.2.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

For the human performance management SCA, this should include:

- an explanation of the applicant's approach to training
- any other discussion to explain performance with respect to human performance management

### [Provide content here]

# 3.2.2 Past performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

• For the human performance management SCA, this sub-section should identify details such as number of qualified staff (e.g., identify how many staff are certified, discuss trends, etc.)

# 3.2.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

[Provide content here]

# 3.2.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

[Provide content here]

# 3.2.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

[Provide content here]

# 3.3 Operating performance

#### SCA definition:

Includes an overall review of the conduct of the licensed activities and the activities that enable effective performance.

This SCA is not relevant to the CMD. [Explain]

# 3.3.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

#### [Provide content here]

# 3.3.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

• For the operating performance SCA, it is very helpful to present any key operating indicators (not only safety indicators).

# [Provide content here]

#### 3.3.3 Future Plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

### [Provide content here]

# 3.3.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# 3.3.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# [Provide content here]

# 3.4 Safety analysis

#### **SCA definition:**

Covers maintenance of the safety analysis that supports the overall safety case for the facility. Safety analysis is a systematic evaluation of the potential hazards associated with the conduct of a proposed activity or facility and considers the effectiveness of preventative measures and strategies in reducing the effects of such hazards.

This SCA is not relevant to the CMD. [Explain]

# 3.4.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

### [Provide content here]

# 3.4.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

For the safety analysis SCA, it is very helpful to include:

- reviews of any analyses conducted in the current licence period
- any new analyses that have been performed

# [Provide content here]

# 3.4.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# [Provide content here]

# 3.4.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# [Provide content here]

# 3.4.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

### [Provide content here]

# 3.5 Physical design

#### **SCA** definition:

Relates to activities that impact the ability of structures, systems and components to meet and maintain their design basis given new information arising over time and taking changes in the external environment into account.

This SCA is not relevant to the CMD. [Explain]

# 3.5.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

• For the physical design SCA, you should also describe the design change process

# [Provide content here]

# 3.5.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

• For the physical design SCA, this section should also identify any relevant performance indicators (such as maintenance indicators)

# [Provide content here]

# 3.5.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

### [Provide content here]

# 3.5.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# 3.5.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# [Provide content here]

### 3.6 Fitness for service

#### **SCA definition:**

Covers activities that impact the physical condition of structures, systems and components to ensure that they remain effective over time. This area includes programs that ensure all equipment is available to perform its intended design function when called upon to do so.

This SCA is not relevant to the CMD. [Explain]

### 3.6.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

### [Provide content here]

#### 3.6.2 Past performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

# 3.6.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# [Provide content here]

# 3.6.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# [Provide content here]

# 3.6.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# [Provide content here]

# 3.7 Radiation protection

#### SCA definition:

Covers the implementation of a radiation protection program in accordance with the *Radiation Protection Regulations*. This program must ensure that contamination and radiation doses received are monitored and controlled, and maintained as low as reasonably achievable (ALARA).

This SCA is not relevant to the CMD. [Explain]

# 3.7.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

#### [Provide content here]

# 3.7.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

For the radiation protection SCA, this section should also:

- explain how the ALARA principle is applied
- present public doses and work doses (in mSv/year)
- compare trends, including reference to regulatory limits and internal action levels

### [Provide content here]

# 3.7.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

For the radiation protection SCA, this section should also:

- explain timing of action level reviews
- discuss plans to reduce dose

# 3.7.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# [Provide content here]

# 3.7.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.).

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

[Provide content here]

# 3.8 Conventional health and safety

### **SCA definition:**

Covers the implementation of a program to manage workplace safety hazards and to protect personnel and equipment.

This SCA is not relevant to the CMD. [Explain]

# 3.8.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

• For the conventional health and safety SCA, this section should also explain the structure and nature of any workplace safety committee(s).

# 3.8.2 Past performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

• For the conventional health and safety SCA, this section should also present the number of lost time injuries

### [Provide content here]

# 3.8.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# [Provide content here]

# 3.8.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

### [Provide content here]

### 3.8.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# 3.9 Environmental protection

#### **SCA definition:**

Covers programs that identify, control and monitor all releases of radioactive and hazardous substances and effects on the environment from facilities or as the result of licensed activities.

This SCA is not relevant to the CMD. [Explain]

# 3.9.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

# [Provide content here]

# 3.9.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

For the environmental protection SCA, this section should also:

- present the results of emission monitoring and environmental monitoring for key radionuclides and hazardous substances
- discuss any trends
- summarize the results of any environmental studies (beyond the required monitoring program)

### [Provide content here]

# 3.9.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# [Provide content here]

# 3.9.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# [Provide content here]

### 3.9.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# [Provide content here]

# 3.10 Emergency management and fire protection

#### **SCA definition:**

Covers emergency plans and emergency preparedness programs that exist for emergencies and for non-routine conditions. This area also includes any results of participation in exercises.

This SCA is not relevant to the CMD. [Explain]

# 3.10.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

# 3.10.2 Past performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

For the emergency management and fire protection SCA, the following information should also be included here:

- number of emergency drills and exercises
- results of fire assessment and reviews
- any improvements made during the licence period

# [Provide content here]

# 3.10.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

### [Provide content here]

# 3.10.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

### [Provide content here]

# 3.10.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# [Provide content here]

# 3.11 Waste management

#### SCA definition:

Covers internal waste-related programs that form part of the facility's operations up to the point where the waste is removed from the facility to a separate waste management facility. This area also covers the planning for decommissioning.

This SCA is not relevant to the CMD. [Explain]

# 3.11.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

• For the waste management SCA, this section should also explain the types of waste generated, and how and where it is managed.

# [Provide content here]

### 3.11.2 Past performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

• For the waste management SCA, this section should also describe the results of any efforts that were made during the licensing period to reduce or minimize waste.

#### [Provide content here]

# 3.11.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# [Provide content here]

# 3.11.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

### [Provide content here]

# 3.11.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# [Provide content here]

# 3.12 Security

#### SCA definition:

Covers the programs required to implement and support the security requirements stipulated in the regulations, the licence, orders, or expectations for the facility or activity.

This SCA is not relevant to the CMD. [Explain]

# 3.12.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

# 3.12.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

# [Provide content here]

# 3.12.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

### [Provide content here]

# 3.12.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

### [Provide content here]

# 3.12.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

# 3.13 Safeguards and non-proliferation

#### **SCA definition:**

Covers the programs and activities required for the successful implementation of the obligations arising from the Canada/International Atomic Energy Agency (IAEA) safeguards agreements, as well as all other measures arising from the *Treaty on the Non-Proliferation of Nuclear Weapons*.

This SCA is not relevant to the CMD. [Explain]

# 3.13.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

# [Provide content here]

# 3.13.2 Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

# [Provide content here]

# 3.13.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# 3.13.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

[Provide content here]

# 3.13.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

[Provide content here]

# 3.14 Packaging and transport

### **SCA definition:**

Covers programs for the safe packaging and transport of nuclear substances to and from the licensed facility.

This SCA is not relevant to the CMD. [Explain]

# 3.14.1 Relevance and management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand, and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

• For the packaging and transport SCA, this section should also explain the type of transport and packaging that is used (routine, non-routine, etc.).

[Provide content here]

# 3.14.2 Past performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include

internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

# [Provide content here]

# 3.14.3 Future plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

# [Provide content here]

# 3.14.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made to CNSC staff.

# [Provide content here]

# 3.14.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

### [Provide content here]

# 4.0 Other Matters of Regulatory Interest

### If no other matters of regulatory interest are relevant to this CMD, then:

- Keep the introductory sentence, "No other matters of regulatory interest are relevant to this CMD".
- Delete sub-sections 4.1 through 4.9.

# If other matters of regulatory interest are relevant to this CMD, then:

- Delete the placeholder sentence, "No other matters of regulatory interest are relevant to this CMD".
- Complete the related sub-sections for that matter.
- Delete any subsections that are not relevant.

**Note:** For each "other matter," refer to the appropriate explanation in Section 6.0 of *Guide for Applicants and Intervenors Writing CNSC Commission Member Documents*.

No other matters of regulatory interest are relevant to this CMD.

# 4.1 Environmental assessment

[Provide content here]

# 4.2 Aboriginal consultation

[Provide content here]

# 4.3 Other consultation

[Provide content here]

# 4.4 Cost recovery

[Provide content here]

# 4.5 Financial guarantees

[Provide content here]

# 4.6 Other regulatory approvals

[Provide content here]

# 4.7 Licensee's public information program

[Provide content here]

# 4.8 Nuclear liability insurance

# 4.9 Additional/Other matters

[Provide content here]

# 5.0 Conclusions

# References

Delete this page if it is not needed.

[Replace this text with an introduction to a list of reference material that will assist the Commission]

1. [Insert list of titles, etc.]

# Glossary

Delete this page if it is not needed.

[Glossary term]
[Glossary definition]

# **Addendum A: Supporting Details**

If applicable, use this placeholder addendum to provide detailed information about the SCAs and "other matters of regulatory interest" that are discussed in the main body of the CMD

Copy and paste the subheading and paragraph placeholders as many times as needed to provide a sub-section for each SCA or "other matter" to be addressed.

Insert tables or graphic information as needed.

Note: The Environmental Releases table is provided as an example for your convenience. The table and related introductory text can be deleted or modified as appropriate.

# [Type Name of Topic (SCA or Other Matter)]

# [Type name of specific area if applicable, or delete this heading]

# [Provide content here]

The following table shows the environmental releases over the current licence period. These releases are well below the licence release limits.

Environmental Releases								
[Gaseous/Liquid/Other] Releases Compared to Licence Limits (Bq/year)								
Nuclear Substance and Form	Current Licence Limit	Total Release [Year]	Total Release [Year]	Total Release [Year]	Total Release [Year]	Total Release [Year]		
[Substance & Form]	[limit]	[release]	[release]	[release]	[release]	[release]		
Total [Substance]	[limit]	[release]	[release]	[release]	[release]	[release]		

If you need to clarify or elaborate upon any table items, enter superscript number(s) in the table and provide notes here.

# Addendum B: [Type Appropriate Heading Or Remove Page]

Replace placeholder text with addendum content or with an introduction to an attachment.

**Note:** Ensure that the information is accessible, publicly available, correctly referenced, or appropriately identified if the author is of the view that the information should be protected.

Copy and paste this page as needed for additional addenda. If none are needed, then delete the placeholder text along with this instructional text. To appropriately identify if the author is of the view that information should be protected

[Type text here]