Comments Report – Public Consultation
Draft Guidance Document GD-384, "Site Access Security Clearance for High-Security Sites"
First consultation: February 9 – March 26, 2012;

	Organization	Section	Comment	CNSC Response
1	OPG	General	The *Nuclear Security Regulations* (NSRs) and the draft RD/GD-384, *Site Access Security Clearance for High-Security Sites*, appear to far exceed the requirements of the Treasury Board as written in the *Policy on Government Security*, Personnel Security Standard as it pertains to the processing requirements for a Site Access Security Clearance (SASC). Two examples of this are: a) NSRs require five year renewal for SASC and Level II, whereas Treasury Board defines 10 year renewal, and b) Treasury Board defines that a clearance being updated does not actually expire for the individual occupying the position.	The purpose of GD-384 is to provide guidance to licensees carrying out the process for granting or denying a site access security clearance (SASC). Some of the guidance contained in GD-384 has been developed based on 10 years of relevant operating experience. In addition, the CNSC has carried out a number of inspections in partnership with the Canadian Security Intelligence Service (CSIS) to evaluate implemented SASC programs. The purpose of a SASC is to minimize the risk to a high-security nuclear facility from the insider threat perspective. It is also important to note that the current Treasury Board *Policy on Government Security – Personnel Security Standard* provides for Special Circumstances (section 3.4) related to screening of personnel who require unescorted access to sensitive sites or facilities such as designated areas within airports. This was the rationale applied in the case of unescorted access to Protected Areas at high-security nuclear sites as defined in the *Nuclear Security Regulations.* In addition, the Treasury Board *Policy on Government Security* references security screening programs that are authorized by statute or regulation. In the case of high-security nuclear sites the *Nuclear Security Regulations* establishes site access clearance requirements including renewal periods for a site access clearance for those requiring unescorted access to a protected area. When the *Nuclear Security Regulations* were amended in 2006 the current Personnel Security Standard (July 1, 2009) was not in place. In addition Transport Canada still maintains a 5 year renewal for a SASC that is required for access to restricted areas within aerodromes. Neither the Treasury Board *Policy on Government Security* nor GD-384 establish the 5 year renewal requirement on an SASC for a high-security nuclear site in Canada; the *Nuclear Security Regulations* do. If the Commission proposed to change the renewal or update period on a SASC from 5 years to 10 years then the *Nuclear Security Regulations* would have to be amended accordingly.

Comments Report – Public Consultation
Draft Guidance Document GD-384, "Site Access Security Clearance for High-Security Sites"
First consultation: February 9 – March 26, 2012;

	Organization	Section	Comment	CNSC Response
				The CNSC has been advised that the Treasury Board *Policy on Government Security* is currently under revision and the intent is to have the SASC renewal requirement be at 5 years.
2	New Brunswick Department of Public Safety (feedback)	General	In both the draft document and the associated comments, there is no indication of the requirement of an out clearance procedure for individuals who have ceased employment with the licensee. Commonly where individuals are employed at a business or agency which requires a security clearance. a briefing is required with that individual at the end of their employment in order to outline the ramifications of information sharing outside the scope of the licensee's work.	Agreed. A new section 10 dealing with termination of employment was added to RD/GD-384. The section provides for licensees to establish a procedure for dealing with individuals whose employment was terminated. Licensees should formally debrief terminated employees on their responsibility to maintain the confidentiality of any sensitive information they had access to during their period of employment.
3	OPG	General	The security interview process, as outlined, will place an increased burden on the licensee, where the licensee has other processes in place to suitably assess risk.	The guidance provided in relation to a security interview is provided to minimize potential risk to the high-security nuclear facility (protected area) and national security. A security interview is normally done only for cause, such as adverse information being discovered during the SASC application or renewal process. What is currently outlined in section 5.3 is recommended to minimize the risk to national security. If a licensee has other processes in place that suitably assess risk to national security then they will be assessed during normal compliance activities to determine if they are acceptable or not. In addition, personal interviews provide an individual with an opportunity to fully explain adverse information that may have been obtained during the course of the security assessment process.
4	OPG	General	The data requirements appear excessive, and not in alignment with Treasury Board. For example, there are no fields on the Treasury Board forms for collection of cell phone usage periods.	As stated previously, the CNSC has been advised that the Treasury Board *Policy on Government Security* is currently under revision. One of the changes under consideration with the new revision is to require a SASC applicant or renewal to provide cell phone numbers. If this revision is approved then there will be a requirement to provide cell phone numbers for vetting purposes.
5	OPG	3 bullet #6	Treasury Board, Personnel Security Standard Section 4.1-Updates indicates SASC, Level 1 and Level II clearances must be updated every 10 years. This is a disconnect between the NSRs and the five year renewal requirement for SASC and Level II clearances.	As noted in item # 1 above neither the Treasury Board *Policy on Government Security* nor GD-384 establish the 5 year renewal requirement on an SASC for a high-security nuclear site in Canada, the *Nuclear Security Regulations* do. It is also important to note that the Treasury Board *Policy on Government Security* is currently under revision. One of the changes under consideration is to require that both a Level II

	Organization	Section	Comment	CNSC Response
				security clearance and a SAC will require an update every 5 years.
6	Bruce Power	4 point 3	1) Verification of information is only conducted for NEW applicants since mandated by GSP in August 2007. Everyone hired before 2007 has been grandfathered, therefore verification of information is not requested. Verification of information on renewals with consistent employment at Bruce Power is not performed because they have already met GSP and have been employed at Bruce Power. 2) Bruce Power requests clarification on what is meant by "personally"? Bruce Power requests a description of the level of verification required to meet this requirement?	1) Agreed. Residence and employment history does not need to be checked. Other personal checks are left to the discretion of the licensee and their governance. This information is now provided in Section 5.2. 2) Personally means in-person. Once data is collected it has to be reviewed and verified by a person delegated by the licensee for this tasking. This may be a licensee employee or an accredited third party contracted by the licensee to provide this service. We are also aware of situations where proof of employment may be provided by third parties such as representatives from organizations such as unions.
7	OPG	4, points 4,5	1) What qualifications are required for the security interviewers, and who will be providing the applicable investigative interviewing techniques training? 2) OPG is requesting further clarification on this point. Is verification of the "necessary information" being referred to from Section 4, Number 1, points a-d, prior to sending to CSIS?	1) The expectation is that licensees can make the determination on the qualifications of the interviewer. The licensee already requires the services of trained interviewers/investigators for a variety of security related items such as on-site security breaches or investigations. RD/GD-384 strongly recommends that licensee's utilize interviewers trained in forensic interviewing techniques to conduct interviews related to the assessment of a SASC applicant or renewal. RD/GD-384 will be revised to include some subject topics that should be part of any forensic interviewing techniques course. If a licensee requires guidance on where to find suitable courses they can contact the CNSC's Nuclear Security Division. 2) Verification of necessary information for reliability assessments can take place in parallel with the loyalty assessment that CSIS carries out in support of a SASC applicant or renewal. The text was amended accordingly.
8	OPG	4.1 1st sentence and bullet #1	1) OPG is requesting clarification on how this notification to the CNSC is to be made; to whom and in what format? 2) OPG is requesting clarification if this applies only to existing employees or contractors holding a SASC.	1) The licensee would be expected to follow the established communication and reporting protocol(s) already in place with the CNSC for these types of notifications. Licensees already have regulatory obligations for notifying the Commission in writing for several areas related to the security of a nuclear facility. Those in relation to a SASC are referenced in the RD/GD-384 draft while others are not. Further clarification is provided in Section 6 of the

	Organization	Section	Comment	CNSC Response
				document. 2) This applies to existing employees or contractors renewing a SASC as well as to SASC applicants.
9	Bruce Power	4.1 1st sentence	How should CNSC be informed and what exactly is being justified?	The licensee would be expected to follow the established communication and reporting protocol(s) already in place with the CNSC for these types of notifications. There are also other regulatory obligations for notifying the Commission in writing for several areas related to the security of a nuclear facility. As to justification the licensee is outlining the measures they have taken to minimize any risk to the protected area in cases where an applicant or a renewal has not met all of the necessary requirements to obtain a SASC based on the circumstances outlined in section 6 of the new version of RD/GD 384.. This section of the document has been edited to clarify this.
10	Bruce Power	4.1 bullet #1	If an applicant does not meet SASC requirements than a SASC *would* not be granted.	Agreed. No change.
11	Bruce Power	4.1 bullet #3	If CSIS identifies adverse information indicating a potential security risk the licensee *would* not grant SASC.	Agreed. No change.
12	AECL (feedback)	4.3	1) "Verify all required information" needs some definition of the personal verification options. 2) Current verification options include inspection of submitted documentation to confirm consistency of all information. In depth verification would only be initiated for cause when there are inconsistencies or suspicious circumstances. Is there an expectation to go further when this draft document is approved? 3) Individual verification of every detail of the clearance such as residence history that appears correct on the face value of submitted information will be an excessive delay in the process and/or cause significant increased resource commitment.	1) When verifying information submitted in support of a SASC applicant or renewal the licensee has the option of using a suitably trained employee or a trusted third party. 2) In-depth verification is dependent on circumstances. The expectation is that a licensee will have a SASC Program in place that clearly sets established threshold criteria that will "trigger" further in-depth verification such as inconsistencies, adverse information or suspicious circumstances. We will amend the related text to clarify. 3) The expectation is that a licensee will have a process in place to verify information such as residence history as part of their SASC program. This program would be assessed as part of the compliance and licensing program to ensure it is satisfactory.
13	AECL (feedback)	5.1	1) "The Site Access Security Clearance (SASC) application should include sections A-P of the security clearance form". This exceeds the current site access and clearance practice accepted by CNSC	1) The CNSC has been advised that the SASC clearance form application is currently under revision. It is expected that the revision will require additional information to be submitted by SASC applicants or renewals. The purpose of this additional information is

	Organization	Section	Comment	CNSC Response
			where sections E, J, K, L, M, N, and O are not completed for SASC. 2) Some of these sections are identified on the Treasury Board forms as exclusive to Level 1, 2 or 3 clearance and adding them to the SASC process will be a significant complication causing additional delay in processing new employees and contractors and/or cause significant increased resource commitment. 3) The original intent of the SASC was to provide a more streamlined process than a Level 2 Clearance and there appears to be no specific reason to consider an increase to the same level of information gathered and investigated for SASC.	to provide for a more comprehensive assessment of SASC applicants or renewals. 2) It is expected that when this revision is complete there will be similar information required whether a person is applying for a Level II or a SASC security clearance. 3) The original intent of the SASC was to use a security clearance already in place for access to sensitive sites or facilities such as restricted areas at airports that could apply to both the Government and private sector. Even though the SASC provides for a more streamlined process than that of a Level 2 security clearance that was not a consideration at the time it was put in place.
14	OPG	5.1 para 3	1) What is the rationale for this requirement? This requirement far exceeds the Treasury Board requirements for a SASC. It is specifically denoted on form TBS/SCT 330-60E that sections K-O are only to be completed for Level III clearances. Section E-Immediate Relatives, has only been a requirement for Level 2 and Level 3 clearances. 2) OPG received concurrence from the CNSC that sections K-O of the Security Clearance Form TBS/SCT 330-60E were not required for updates (renewals). CSIS was in agreement with this, except upon request on a case by case basis. There are no fields on form TBS/SCT 330-60E to record usage periods for cellular phones, again beyond Treasury Board requirements.	1) The SASC clearance form application is currently under revision. It is expected that the revision will require additional information to be submitted by SASC applicants or renewals. The purpose of this additional information is to provide for a more comprehensive assessment of SASC applicants or renewals. 2) The CNSC has been advised that the Treasury Board *Policy on Government Security* is currently under revision. One of the changes under consideration with the new revision is to require a SASC applicant or renewal to provide cell phone numbers. If this revision is approved then there will be a requirement to provide cell phone numbers for vetting purposes.
15	Bruce Power	5.1 para 3	It is not feasible to expect licensees to collect and verify email and cell telephone numbers including the period they were used nor is it possible to validate that the information provided is comprehensive and accurate. Bruce Power requests the CNSC further describe how licensees are expected to verify this information.	The CNSC has been advised that the Treasury Board *Policy on Government Security* is currently under revision. One of the changes under consideration with the new revision is to require a SASC applicant or renewal to provide cell phone numbers. If this revision is approved then there will be a requirement to provide cell phone numbers for vetting purposes. The licensee is responsible for implementing a program to ensure all necessary information is submitted in support of a SASC

	Organization	Section	Comment	CNSC Response
				application or renewal.
16	Bruce Power	5.1 para 5	What is meant by "for cause". Bruce Power requests clarification.	"For cause" means a determination that there is sufficient reason to review, revoke, suspend or downgrade a reliability status or a security clearance. In the context of a security assessment, a determination whether more in-depth verifications are required. Examples of "for cause" include previous bad credit rating, personal bankruptcy and a related criminal conviction record (e.g. fraud). The term was added to the Glossary.
17	NBPN	5.1	Site access security clearance application, we only complete section E Immediate Relatives for Level II Secret only, not site access applications.	The SASC clearance form application is currently under revision. It is expected that the revision will require additional information to be submitted by SASC applicants or renewals. The purpose of this additional information is to provide for a more comprehensive assessment of SASC applicants or renewals.
18	OPG	5.1.1 paras 1 and 3	1) OPG requests clarification if this paragraph applies to Canadian citizens or landed immigrants and if a local check (s) is sufficient in certain circumstances and/or where a national or state check is not available. 2) OPG abides by the CPIC policy in the determination of the fingerprinting requirement, subsequent to a "positive hit" after the initial CRNC using name and date of birth. OPG requests clarification on the meaning of "unavailable, incomplete or an unpardonable indictable conviction exists." The process of arranging for fingerprint verification in any country other than the U.S seems excessive and will be overly burdensome, in addition to causing long delays in processing the applicant's clearance.	1) This section applies to anyone applying for a SASC with less than 5 years traceable history in Canada. 2) There are several countries that do not have a recognized criminal record name or conviction check process in place. In such cases the onus is on the licensee to verify criminal conviction information from a trusted third party if a recognized service is not in place. It is imperative that a credible verification process be in place for those SASC applicants that have less than 5 years of traceable history within Canada. Any potential risk to high-security sites, including its operation and personnel, and national security must be assessed in a credible way.
19	Bruce Power	5.1.1	1) Para 1 – Bruce Power requests clarification on what duration of time is considered residence? 2) General Comment – Are licensees expected to validate the administration of CRNC within different countries including jurisdictional issues and reciprocal arrangements? 3) Para 3 – Pursuant to RCMP directive CRNC based upon name and date of birth is not sufficient to verify identity. Must have fingerprints verification.	1) Six (6) months or more is considered residence. In the case of transient workers who move frequently then the expectation is that the licensee's SASC program would have a process in place to satisfactorily assess criminal history. 2) Yes, licensees are expected to obtain a CRNC or a police certificate from a recognized authority in the country that they visited or resided in. 3) Agreed.

Comments Report – Public Consultation
Draft Guidance Document GD-384, "Site Access Security Clearance for High-Security Sites"
First consultation: February 9 – March 26, 2012;

	Organization	Section	Comment	CNSC Response
20	Bruce Power	5.1.2	1) Para 1 - What duration of time is considered residence? 2) Para 2 – This represents a significant shift from security practices established in nuclear industry. Bruce Power does not currently transfer certificates specific to foreign nationals and we cannot accept verification of CRNC results from foreign interests. (This suggestion is outside of inner utility working agreement as well). Bruce Power performs a risk assessment on each applicant based upon Criminal History disclosed by applicant on completion of 23E and verification of full disclosure by service provider. Further, transfer of CRNS results is a violation of Privacy Law. There is no way that a Foreign interest should determine what is or is not an acceptable risk for Bruce Power in terms of Unrestricted Access to the Protected Area. That is essentially what this clause promotes and authorizes. Bruce Power recommends this paragraph be removed as a licensee should not be required to accept a risk assessment conducted by another licensee.	1) Six (6) months or more is considered residence. 2) Section 5.2.3 of the text has been revised to provide for the option to set up an arrangement to obtain NATO screening certificate. RD/GD-384 does not require a licensee to accept a NATO Security Screening Certificate or a risk assessment conducted by another licensee. Wording was clarified to state licensees are not bound to utilize this option.
21	NBPN	5.1.2	Foreign nationals, currently we do not accept any other clearances other than Canadian Nuclear Utilities that fall under our Inter Utility Agreement. It's never been our practice to accept any clearance from NATO, United Kingdom, New Zealand, Australia or United States.	Section 5.2.3 of the text has been revised to provide for the option to set up an arrangement to obtain NATO screening certificate. RD/GD-384 does not require a licensee to accept a NATO Security Screening Certificate or a risk assessment conducted by another licensee. Wording was clarified to state licensees are not bound to utilize this option.
22	OPG	5.1.2 paras 1 and 2	1.) OPG requests a definition of "foreign national". Our interpretation is that "foreign national" has a different meaning and different requirements than "less than five years traceable history in Canada" based on this draft document. OPG requests clarification on the value of obtaining a CRNC from a person's country of origin-for instance, if they lived in the country where they were born for only 5 years and moved to another country for the rest of their life, what value is a CRNC?	A definition of "foreign national" was added to the Glossary. The requirement for obtaining a CRNC from a person's country of origin may be waived depending on unique circumstances including passage of time. If a licensee has a SASC applicant that they believe do not feel it is necessary to provide a CRNC from a person's country of origin they have the option of discussing whether the CRNC is necessary or not with the appropriate CNSC staff. OPG can accept CRNC's from a trusted third party. If guidance on what constitutes a trusted third party they can follow-up with CNSC

	Organization	Section	Comment	CNSC Response
			OPG requests clarification if this means we can accept CRNCs from a trusted third party ie; Creative Services. OPG also requests clarification if CRNCs for all countries where a foreign national has resided for the past five years can also be accepted from a trusted third party. OPG requests clarification on the timeline-within the past five years, and lived in the area for greater than six months cumulative? 2.) OPG is requesting clarification if this statement means the <u>only</u> countries belonging to NATO where we may accept security clearances is the U.K, New Zealand, Australia or the United States. OPG also requests clarification if these people are to be employed at high security sites, or can we accept security clearances from anybody belonging to NATO who has a NATO Personnel Security Clearance, and is applying for a security clearance at OPG. If NATO clearances can be accepted, can we then start accepting clearances from State Nuclear Facilities (PADS)? Previous practice is that OPG cannot accept security clearance certificates from other organizations within Canada: for example, Transport Canada, Public Safety, RCMP, etc., therefore this too requires clarification.	staff. This item has been reviewed at previous security compliance inspections conducted at OPG nuclear sites and the process that OPG had in place at the time of those inspections was deemed to be satisfactory. In cases where a Foreign National indicates they have a valid security clearance from any one of the North Atlantic Treaty Organization (NATO) countries then licenses who wish to do so have the option of setting up an agreement with Public Works and Government Services Canada to obtain a security clearance verification certificate for that person. Such certification will be deemed to meet the necessary SASC assessment criteria when a person has less than 5 years of traceable history in Canada. At this time we are not accepting security clearances from State Nuclear facilities. Licensees who wish to do so may accept a screening certificate from other Canadian Government agencies such as Transport Canada.
23	Bruce Power	5.2.1 paras 1-3	1) Para 1 – Clearance will not be granted until a risk assessment can be completed including full criminal history disclosure. Fingerprints are also submitted to verify identity. A licensee *would not grant clearance without having full disclosure, therefore a security interview is irrelevant.* 2) Para 1 – Bruce Power requests CNSC describe what qualifications are required by the interviewer? 3) Para 2 – Licensees are not entitled to information relating to,"subsequent checks conducted by law	1) Acknowledged. 2) Para 2 - The expectation is that licensees can make the determination on the qualifications of the interviewer. The licensee already requires the services of trained interviewers/investigators for a variety of security related items such as on-site security breaches or investigations. RD/GD-384 will recommend that licensee's utilize interviewers trained in forensic interviewing techniques to conduct interviews related to the assessment of a SASC applicant or renewal. RD/GD-384 will be revised to include some subject topics that should be part of any forensic interviewing techniques course. If a licensee

	Organization	Section	Comment	CNSC Response
			enforcement". Bruce Power recommends this sentence be removed. 4) Para 2 – Once a clearance is granted an employee's work assignment may change requiring them to work in different areas of the facility from the areas assigned at the time a clearance was granted. Bruce Power requests clarification regarding expectations for how licensees should manage/review staffing changes for personnel with criminal history. 5) Para 2 – Does the CNSC expect licensees conduct security interview for every person with a criminal conviction? Or just criminal convictions that "identify adverse information"? What is meant by "adverse information"? This statement is subjective and requires clarification. 6) Para 3 – Bruce Power believes limiting review of 5 years criminal history is to limiting and does not provide enough background to conduct a sound risk assessment. Bruce Power recommends this paragraph be revised to state a review of all adult convictions.	requires guidance on where to find suitable courses they can contact Nuclear Security Division. 3) Para 2 – Agreed. The reference to "subsequent checks" has been removed from the document. 4) The expectation is that the licensee would have a process in place as part of their SASC program to assess risk in the case of staff that may have a criminal conviction record that are being transferred to a new assignment or position. This would be dependent on an assessment of the new job duties to determine access to sensitive information or assets. The expectation is that for those requiring access to vital areas that have a criminal history that they would be reassessed from the risk perspective in the case of job transfers or work reassignments. 5) The CNSC expects that licensees will have a SASC Program in place that clearly sets established threshold criteria that will "trigger" a security interview. This could include the circumstances of the criminal offence (nature, frequency, passage of time, indictable vs. summary etc.), Licensees must also consider any potential risk to the protected area, national security or site operations given the duties and tasks to be assigned for the individual being considered for the granting of a SASC. The SASC Program will be assessed as part of the CNSC compliance program to determine if it is satisfactory or not. We will insert language clarifying this expectation into RD/GD-384. The document was revised tp clarify the CNSC's position. 6) Para 3 - Agreed. The 5 year limitation was removed from the document .
24	OPG	5.2.1 paras 1 and 2	1) OPG requests clarification on what constitutes an incomplete CRNC. OPG's process is that if the initial CRNC on the person based on name and date of birth returns from the police agency conducting the check, OPG abides by the CPIC policy for fingerprinting. OPG then awaits the Criminal Record Report from the RCMP and assesses whether the clearance will be issued or not, based on our existing threshold criteria. 2) If an individual self declares on criminal convictions, and this is then confirmed through a CPIC check to be below threshold (OPG policy is 3 summary convictions, one indictable may lead to denial), what is the value of a	1) An incomplete CRNC is one that requires fingerprint verification so that it can verified that the person being assessed for a SASC either has or does not have a criminal conviction(s) record for which they have not been pardoned. 2) One of the purposes of a security interview is for the licensee to assess risk. The requirement for an interview is based on adverse information as well as for cause. For example if a person had been convicted of fraud and the licensee discovered that they had provided false information in regards to their professional qualifications then it would be expected that an interview be conducted to assess risk.

	Organization	Section	Comment	CNSC Response
			security interview? OPG requests clarification on the meaning of "will"?	The CNSC expects that licensees will have a SASC Program in place that clearly sets established threshold criteria that will "trigger" a security interview. This could include the circumstances of the criminal offence (nature, frequency, passage of time, indictable vs. summary etc.), Licensees must also consider any potential risk to the protected area, national security or site operations given the duties and tasks to be assigned for the individual being considered for the granting of a SASC. The SASC Program will be assessed as part of the CNSC compliance program to determine if it is satisfactory or not. We will insert language clarifying this expectation into RD/GD-384. If the declaration of a criminal conviction contains circumstances related to adverse information then the expectation is that the licensee will conduct a security interview to adequately assess any potential risk to the facility or national security.
25	OPG	5.2.2 para 1	OPG does the verifications as outlined, and utilizes trusted third parties for verification of supporting documentation. We also accept certified or notarized copies, as it would be literally impossible in all cases for the verifier to be an employee of the licensee.	Acknowledged. Section 5.2.5 was revised to clarify that the verifier does not always have to be an employee of the licensee.
26	OPG	5.2.3	In most cases, OPG uses a trusted third party service provider for verification of education and /or professional qualifications. OPG also utilizes trusted third parties for verification of all supporting documentation that accompanies a SASC.	Acknowledged. Section 5.2.4 was amended to allow for trusted third party verification.
27	AECL (feedback)	5.3	**"Interviews should be conducted by two persons".** This should be limited to high risk interviews routine low risk interviews can easily be handled by one screening officer. An example of a single person interview would be clarification of a residential gap or minor criminal record where waiting for two persons to be scheduled would cause unreasonable delay.	Agreed. The text was amended accordingly.
28	New Brunswick Department of Public Safety (feedback)	5.3 para. 6 and 5.4.1	While section 5.3 paragraph 6, and section 5.4.1 detail the procedure pertaining to individuals who, based on the security interview, should only obtain limited unescorted site access that is subject to certain restrictions, there is no mention of procedure in the event of a licensees possible obligation to employ an	The "duty to accommodate" should not impact the clearance level for applicant. If the clearance is valid, the applicant must follow the usual policies and procedures for the site.

	Organization	Section	Comment	CNSC Response
			individual regardless of the results of the interview as a result of "duty to accommodate".	
29	OPG	5.3 paras 1, 2, 3, 4, 6	1) OPG requires clarification as to who the senior program authority is, and may this authority be delegated? What qualifications are required for the security interviewers, and who will be providing the applicable investigative interviewing techniques training? Once the training is received, is there refresher training required? 2) OPG requests clarification on what is meant by "certified", and what is the duration of the certification?. 3) OPG will conduct interviews in certain circumstances as outlined; however, we have other proven processes to determine acceptable risk. This will not necessarily be done in a formal interview. OPG requests clarification if there is a specific timeframe to be considered relating to unpardonable indictable convictions and past criminal history-ie: summary convictions >10 years. 4) OPG requires clarification on who will be providing the detailed analytical examination of information provided by the individual, where other means of verification are not available. OPG uses other verification tools through our Intelligence analyst, as an example, to assist in verifying authenticity, on a case by case basis. 5) OPG has no plans to implement polygraph testing. Not only are we not qualified to administer such a test, but the unionized environment structure at OPG may find this extremely unacceptable if it were even to be suggested we facilitate this process. CSIS conducts assessments on verification of reliability as it relates to "loyalty" and uses this tool on a case by case basis. 6) OPG requires clarification on this requirement. The suggestion of a review panel and an independent senior licence program authority seems excessive, and this	1) The senior program authority is the site license holder. This authority can be delegated by the site license holder. The expectation is that licensees can make the determination on the qualifications of the interviewer. The licensee already requires the services of trained interviewers/investigators for a variety of security related items such as on-site security breaches or investigations. RD/GD-384 strongly recommends that licensee's utilize interviewers trained in forensic interviewing techniques to conduct interviews related to the assessment of a SASC applicant or renewal. RD/GD-384 will be revised to include some subject topics that should be part of any forensic interviewing techniques course. 2) The language around certification of a security interviewer will be clarified. If a licensee requires guidance on where to find suitable courses they can contact Nuclear Security Division. Certified means someone that is appropriately trained to carry out a security interview. 3) As part of normal compliance activities we will assess SASC Programs to ensure we are satisfied that the established threshold criteria that will "trigger" a security interview are satisfactory. 4) Acknowledged. The licensee will be expected to provide the detailed analytical examination of information provided by the individual for security assessment purposes. 5) The reference to polygraph testing has been removed from the document. 6) The reference to a review panel has been removed from the document. The purpose of this section is to provide guidance only. Some of the guidance provided is based on operating experience at a variety of sites. If OPG feels that their current process is robust enough then they can choose not to follow the applicable guidance.

	Organization	Section	Comment	CNSC Response
			process does not appear to be outlined in the Treasury Board guidelines. OPG has documented processes in place on the steps to follow for granting/denying a SASC that includes appropriate OPG senior security management input.	
30	Power Worker's Union	5.3	Section 5.3 of the Draft RD-384 deals with "security interviews." Under the *Personnel Security Standard* ("PSP"), a security interview is not required for SASC, in the usual course. The PWU submits that Draft RD/GD-384 should be amended to clarify that this section applies only where there is cause to conduct a security interview under the PSP.	The CNSC expects that licensees will have a SASC Program in place that clearly sets established threshold criteria that will "trigger" a security interview. This could include the circumstances of the criminal offence (nature, frequency, passage of time, indictable vs. summary etc.), Licensees must also consider any potential risk to the protected area, national security or site operations given the duties and tasks to be assigned for the individual being considered for the granting of a SASC. The SASC Program will be assessed as part of the CNSC compliance program to determine if it is satisfactory or not. We will insert language clarifying this expectation into RD/GD-384. If the declaration of a criminal conviction contains circumstances related to adverse information then the expectation is that the licensee will conduct a security interview to adequately assess any potential risk to the facility or national security.
31	Bruce Power	5.3	1) Para 2 - Bruce Power requests clarification on what is meant by "certification". 2) Para 3 – It is not uncommon for documentation / information related to a clearance application to be incomplete. Applications are not processed until complete information is received and therefore a clearance would not be granted. Bruce Power requests clarification regarding when a security interview is required due to incomplete information / documentation. If an applicant fails to provide the required information, the clearance does not proceed. It is not feasible to expect licensees to move to an interview as a result of incomplete information. 3) Para 4 - Polygraph may be challenged as a measure of employability and reliability. Due to geographic isolation it would be necessary to have polygraph machine and evaluator based on site.	1) The language around certification of a security interviewer will be clarified 2) Para 3 - Agreed. For interview criteria see CNSC response to Item #30. 3) Para 4 - The reference to polygraph testing has been removed from the document. 4) Para 6 - We want to ensure that there is a verifiable link to the site license holder for the granting, denial or revocation of a SASC. We will revise wording in this section to improve clarity. I have added the word revocation in some of the text to make it more consistent with other parts of the document. 5) Para 7 - If a licensee chooses not to utilize limitations that is acceptable to the CNSC. Operational experience has demonstrated the need for some flexibility in this area.

	Organization	Section	Comment	CNSC Response
			4) Para 6 - Currently decision to grant clearance is held by Security Clearance Program and Department Manager. This program has been created based upon 10 years of historical evidence and meeting with CSIS to establish "reliability" status. To open the program to decision by external authorities, takes authority away from clearance, and no longer makes Clearance the accountable organization. Bruce Power recommends this paragraph be revised. 5) Para 7 – It is not feasible to expect licensees to be able to effectively enforce the type of limitations described in this paragraph. In today's business world, these types of limitations are not reasonable. If a person poses enough of a risk to require these types of limitations, they should not be granted access to a nuclear power plant. Bruce Power recommends this paragraph be removed.	
32	Power Worker's Union	5.3 para 4	We note that the PSP does not detail the method or process for the security interview. Draft RD/GD-384 suggests that the security interview is a "detailed analytical examination of the information provided...where other means of verification are not available." (p. 5).	Additional language around the requirement to conduct a security interview has been provided.
33	Power Worker's Union	5.3 para 4	The PWU recognizes that a security interview may be appropriate where the information is incomplete or irregular in some way, as set out in the PSP. However, Draft RD/GD-384 suggests that the security interview may include other "verification tools" including a polygraph test. A polygraph test is an invasive and potentially unreliable tool. This is recognized in section 69 of the Ontario *Employment Standards Act*, *2000,* S.O. 2000, c. 41 (which applies to nuclear facilities in Ontario), which provides that an employee or prospective employee has the right to not to: a. take a lie detector test; b. be asked to take a lie detector test; or c. be required to take a lie detector test. As such, the use of polygraph tests in the SASC	The reference to polygraph testing has been removed.

	Organization	Section	Comment	CNSC Response
			clearance process for individuals who are employees or prospective employees of licensees is inappropriate, and, in Ontario and other jurisdictions with similar employment standards legislation, contrary to law. As such, Draft RD/GD-384 should not condone their use. The PWU submits that reference to polygraph tests, and to other unspecified "verification tools", should be deleted from Draft RD/GD-384.	
34	AECL (feedback)	5.4.1 last para	"Adverse information that is considered a risk". This should be stated as "unacceptable risk".	Any adverse information has the potential to indicate a risk therefore it must be assessed accordingly.
35	OPG	5.4.1 para 1	OPG would not impose security restrictions for existing employees who are under review with CSIS for extended periods unless CSIS indicated there was adverse information. As for restrictions applicable to CRNC information, OPG has proven documented processes in place.	Acknowledged. We assume this is an infrequent occurrence so will add additional text to ensure that the CNSC is advised of such cases. This will provide CNSC staff with the opportunity to evaluate the steps that a licensee has put in place to minimize risk to the site until the CSIS assessment is completed. Section 5.4.1 of the document was amened to allow the applicant to work in his existing position while waiting for the CSIS indices check.
36	Bruce Power	5.4.1 para 1	1) Para 1 – see comments in section 5.3 para 7 related to restrictions. 2) Para 1 - CRNC cannot reveal "charges" only confirm convictions based upon disclosure by the applicant. Furthermore, Government of Canada forms only ask for convictions – not charges. Bruce Power recommends this section be updated as such.	1) Comment noted. **The** paragraph was revised. 2) Disagree. There have been occasions where this type of information is brought to the attention of a licensee. If the licensee becomes aware that a person had been charged with a serious criminal offence they may have to be assigned alternate work duties until the charge is adjudicated in court. We will revise wording to clarify.
37	AECL (feedback)	5.4.3	This section is titled Report to the CNSC but only speaks to the potential for CNSC review (interpreted as audit). There needs to be more clarity on the expectation to report all security interviews or to have them available for audit. Available for audit is preferred especially for minor interviews such as low risk credit and criminal history interviews that are relatively frequent and formal notification to the CNSC would be a significant increase in formal correspondence.	Acknowledged. We will add additional text to clarify this area. Text was clarified in new version, at the end of section 6.
38	AECL (feedback)	5.5	"ensure enough time to complete and consider all required indices and other assessments before the SASC expires". This should be adjusted to be	The SASC does expire after 5 years for the purposes of being authorized to enter the protected area unescorted. The 5 year term

	Organization	Section	Comment	CNSC Response
			consistent with Treasury Board guidance that suggests the clearance does not expire as long as the update is in progress. This is important because some checks get hung up for extended periods beyond the control of the licensee. 4.1 Updates "Departments must update an individual's enhanced reliability status, Level I and Level II security clearances once every ten years. Site access security clearances also must be updated every ten years. A Level III security clearance must be updated once every five years. Every effort should be made to have the screening updated before the end of the update cycle. If for any reason this is not possible, the reliability status or security clearance does not expire for the individual occupying the position. This regular update cycle does not preclude the department from reviewing a person's reliability status or security clearance more frequently for cause".	is established by the NSRs not TB Security Policy. The statement indicating SASC's must be updated every 10 years is not correct in the case of protected areas at high-security nuclear sites. SASC's for protected area access are only valid for 5 years as stipulated in the NSRs. We concur with the statement indicating a person's reliability status or security clearance can be reviewed at any time for cause.
39	OPG	5.5	1) OPG has a robust security clearance renewal process that is initiated for existing employees one year in advance of employee's expiry. 2) Treasury Board, Personnel Security Standard Section 4.1-Updates, indicates clearances do not actually expire, if over the time limit, for individuals occupying the position. 3) Treasury Board, Personnel Security Standard Section 4.1-Updates, also indicates SASC, Level I and II clearances must be updated every 10 years. This is a disconnect between Nuclear Security Regulations and the five year renewal requirement for SASC and Level II clearances.	1) No change. 2) As noted in item #1 above the *Nuclear Security Regulations* stipulate that SASC is only valid for 5 years. 3) When the *Nuclear Security Regulations* were amended in 2006 the current Personnel Security Standard (July 1, 2009) was not in place. In addition Transport Canada still maintains a 5 year renewal for a SASC that is required for access to restricted areas within aerodromes. Neither the Treasury Board *Policy on Government Security* nor GD-384 establishes the 5 year renewal requirement on an SASC for a high-security nuclear site in Canada; the *Nuclear Security Regulations* do. If the Commission proposed to change the renewal or update period on a SASC from 5 years to 10 years then the *Nuclear Security Regulations* would have to be amended accordingly. The CNSC has been advised that the Treasury Board *Policy on Government Security* is currently under revision and the intent is to

Comments Report – Public Consultation
Draft Guidance Document GD-384, "Site Access Security Clearance for High-Security Sites"
First consultation: February 9 – March 26, 2012;

	Organization	Section	Comment	CNSC Response
				have the SASC renewal requirement be at 5 years..
40	OPG	5.6	OPG requests clarification on this point. OPG's process is to honour the SASC from another Canadian Utility, per the Inter-Utility Security Agreement, using a Security Screening Certificate. This allows the person to come in to work without delay. However, we require the Treasury Board forms to be completed for OPG's clearance process thereafter-we do not receive a copy of the person's SASC from the other utility, as the individual provided consent to the other utility for the collection of their confidential information (Privacy Act issues)	Text has been revised to allow SASC transfers, provided both sites have a CNSC approved program in place.
41	Bruce Power	5.6	Bruce Power requests clarification – does this refer to Canadian high-security sites?	Yes, it does.
42	Power Worker's Union	5.7	Under Draft RD/GD-384, the SASC and all associated documentation is to be retained for audit purposes in accordance with the licensee's governance on retention and destruction (section 5.7). The RD/GD-384 should indicate that any security documentation be kept in a confidential and secure manner, as it will likely contain highly confidential and personal information. The PWU submits that the RD/GD-384 should direct licensees to retain all documentation associated with the SASC separately from any employment file (to the extent possible under the NSRs), and advise licensees that all documentation associated with the SASC should be used only for the purposes of obtaining and retaining the SASC authorization and should not be used for employment-related purposes.	Text was clarified in new version, section 9.

REGDOC-2.12.2 (formerly GD-384), *Site Access Security Clearance*
Comments received from public consultation

Comments received during additional consultation (November 13, 2012 to January 13, 2013): 39 comments from 3 reviewers

	Section	Organization	Comment	CNSC Response
1.	General	OPG	GD-384 appears to be imposing Government of Canada wordings and processes on licensees with established Site Access Security Clearance (SASC) processes that have already been approved by the CNSC. The revised document contains reference to numerous acts, regulations and alternate processes, making certain sections contradictory. It is therefore difficult to interpret this revised guidance document for granting, denying or revoking a SASC.	This document was designed to assist licensees in understanding the SASC process as it compares to Government of Canada screening processes. The document was amended to clarify its purpose and address this concern. The document has been revised to clarify the process for granting, denying or revoking a SASC. In terms of certain sections being contradictory, further review of the document has not detected any such contradictions. Therefore no changes were made.
2.	General	OPG	The *Nuclear Security Regulations* (NSRs) require that SASCs and Level II Clearances be renewed every five years, whereas the Treasury Board allows for 10 year renewal. OPG believes all SACS and Level II Clearances should be valid for a period of 10 years as per Treasury Board Guidelines.	In order to minimize the risk to high-security nuclear sites from the insider threat the five year renewal period for SASC's and clearances equivalent to Secret clearances was set out as a requirement within the NSR. The CNSC has been advised that the Treasury Board *Policy on Government Security* is currently under revision and the intent is to have the SASC renewal requirement remain at 5 years.
3.	General	OPG	There is an unrationalized disparity between the NSRs and the draft GD-384, whereby CNSC Inspectors are exempted from the 5 year renewal period; rather the validity period is 10 years.	This document does not apply to CNSC staff that have a Government of Canada Security Clearance. The statement has been removed from the document's preface. Treasury Board Secretariat is currently reviewing the *Policy on Government Security* and the *Personnel Security Standard*. Upon completion of the review, CNSC will determine the need for a review of the NSRs.
4.	General	OPG	The Treasury Board defines that a clearance in the process of being updated does not actually expire for the individual occupying the position.	Yes, this is correct as stipulated in the *Personnel Security Standard*. However, as per sub-section. 17. (1.2) of the NSRs, a SASC is only valid for five years.

	Section	Organization	Comment	CNSC Response
				In addition the Treasury Board *Policy on Government Security – Personnel Security Standard* provides for Special Circumstances (section 3.4) related to screening of personnel who require unescorted access to sensitive sites or facilities such as designated areas within airports. This was the same rationale applied to Protected Areas at high-security nuclear sites.
5.	General	OPG	The security interview process, as outlined, will place an increased and unnecessary burden on the licensee, where the licensee has other processes in place to suitably assess risk.	Security interviews conducted by trained investigators are one essential tool to follow-up on adverse information to assess risk. If a licensee has other suitable means of assessment that are equally robust then they have the option of using other processes provided they suitably assess risk.
6.	Preface	OPG	There is a disparity between the NSRs and the draft GD-384, whereby CNSC Inspectors are exempted from the 5 year renewal period. What is the legislative basis for the exemption for CNSC inspectors? OPG believes all SACS and Level II Clearances should be valid for a period of 10 years as per Treasury Board Guidelines. NSRs require five year renewal for SASC and Level II, whereas Treasury Board defines 10 year renewal.	Agreed. The statement on inspectors being exempt from the SASC has been removed. See previous item #4 response.
7.	Preface	OPG	OPG's interpretation of "should," "may" and "can" suggests the licensee is provided with discretionary latitude. OPG is seeking confirmation that this interpretation is correct. GD-384 is a draft guidance document; therefore, OPG suggests the word "regulatory" be removed from this paragraph 2 occurrences in the definitions legend.	Confirmed, this interpretation is correct. No change. Both guidance and requirement documents are referred to as “regulatory documents” by the CNSC.

	Section	Organization	Comment	CNSC Response
8.	4.1	AECL	"Designated, classified information" Should be changed to non-classified information as SASC does not authorize access to classified information.	This section has been clarified. Individuals with a security clearance equivalent to a Level II, Secret may be required to access designated/classified information on a "need-to-know" basis.
9.	4.1, 5.3.1	AECL	"Risk to the nuclear site, to personnel working there or to national security" SASC is exclusive to Protected Area access and defining it as a risk management tool that protects the entire site and the personnel working there exceeds the scope of the SASC.	Agreed. Text amended to read "Protected Area" as opposed to "Site".
10.	4.1para# 3	OPG	OPG utilizes the SASC, at a minimum for physical access to the protected area of high-security sites and/or access to information designated by OPG as classified or prescribed information - the reference to GOC designated 'classified' information throughout GD384 (including tables 1 & 2 in appendix D) causes confusion for the reader.	Agreed. The text has been clarified accordingly. Only individuals with a security clearance equivalent to a Level II, Secret and a valid "need-to-know" may access classified information.
11.	4.1para #4	OPG	OPG suggests that this be removed. It is not reasonable to impose GOC wording/processes on licensees with established SASC processes. Much of this section describes processes and requirements beyond the scope of a SASC.	The SASC process is comparable to the GOC screening process. The section has been modified to address this concern.
12.	4.2 Bullet #2	Point Lepreau	Bullet #2 states the applicant providing the necessary information to apply for the appropriate level of clearance? This section is specific to the SASC process, clarify wording of "appropriate level of clearance" to "Site Access	Agreed. Text amended accordingly.
13.	4.2 Bullet #2	AECL	….. the necessary information to apply for the "appropriate level of clearance".	Agreed. Text amended accordingly.

	Section	Organization	Comment	CNSC Response
			Should be changed to - the necessary information to apply for a SASC". Other clearances are outside the scope of this document. Reference to Secret clearances appear elsewhere in the document and are equally out of scope.	
14.	4.2 bullet #3	OPG	This will create an unnecessary administrative burden for OPG due to the volume of security clearances processed and the geographical distances between applicants and facilities.	It is essential to conduct this briefing as part of the SASC process. The document has been amended to allow this briefing to be conducted remotely (e.g. teleconference to a person off-site) to reduce the administrative burden on the licensee.
15.	4.3 Bullet #4	OPG	OPG does not grant a SASC until all components of the security assessment are complete. OPG agrees with reliability taking place in parallel with loyalty assessment. OPG requests the last sentence be removed. Processing of the assessments in parallel allow for timely processing of the large volume of clearances that OPG conducts, in order to avoid a negative impact to business operations. OPG processing is congruent with this parallel process as	The document has been clarified to address this comment. CSIS requires that reliability be confirmed before they conduct their assessments.
16.	4.4	AECL	"The criteria used to decide whether a security interview is necessary should include assessing the risk to site and national security." Security interview is a new term that has historically been defined as a subject interview. The term subject interview is consistent with TBS 2-4 Personnel Security Standard and the creation of a new terminology is unnecessary.	It is important to distinguish "security interview" from the CSIS "subject interview" in order to ensure continuity and a clear understanding of who is conducting the interview.
17.	5.2	Point Lepreau	Our current direction for site access applications has been all sections with the exception of Section E – Immediate Relatives (required for Level II only) were to be completed which is contrary to the government screening	This section has been amended to provide the licensee the flexibility needed to establish the screening requirements necessary in order to meet the NSRs.

	Section	Organization	Comment	CNSC Response
			requirements; the Government of Canada forms states that sections "K to O" only to be complete for Level III. However Draft November 2012 suggest that we only complete sections A, B, C, D, F, H, I and P but Appendix B chart reflects that "section K Travel" & Section L Foreign Employment/Assets" are to be completed. Section M Character References was requested to be completed in 2008. What sections are required to be completed for a site access clearance?	
18.	5.2 para #1	OPG	OPG suggests including Sections K-O as compulsory sections for new applicants in order to conduct an informed security assessment. OPG has previously commented that these sections are not required for renewals.	This section has been amended to provide the licensee the flexibility to establish the screening requirements necessary in order to meet the NSRs.
19.	5.2.1	Point Lepreau	Are birth certificate and passport both mandatory? Current practice is to have "proof of birth, birth certificate or passport" and "government issued photo ID, etc. driver license or passport". Passport won't suffice for both.	Agreed. The section has been revised to require two pieces of valid government identification.
20.	5.2.1 para #2	OPG	To clarify this section, OPG recommends that this be reworded to: "Verified original documentation should include 2 pieces of validly issued government identification from the following list (one must be a photo identification): • Birth certificate • Passport • Valid work permit • Permanent resident card • Canadian citizenship card or other government-issued photo identification"	Agreed. The section has been revised to require two pieces of valid government identification.

	Section	Organization	Comment	CNSC Response
21.	5.2.2 last para	AECL	"The onus is upon the licensee to verify criminal conviction information from a trusted third party". Can a third party be used where an inefficient CRNC process exists (such as U.S.A.)?	Yes, a third party can be used. The onus would be on the licensee to ensure that if a third party is used, that they are an accredited organization or agency with operating experience in the area of traceable history.
22.	5.2.3 para #1	OPG	OPG requests a revision to this section to limit this requirement to applicants who left their country of origin within the last 10 years. OPG considers that a 10 year timeframe would provide sufficient detail to adequately assess risk.	Clarification has been provided to OPG. They have retracted this comment.
23.	5.2.3 para #2	AECL	This section recognizes the NATO clearance if we complete the SASC documentation. If we have to complete all of the SASC process, what if any value is the NATO clearance? Perhaps this could be clarified by stating the items that can be excluded i.e. no requirement for CSIS indices check, CRNC etc.	CNSC has removed this section.
24.	5.2.3 para #2	OPG	OPG requires information on obtaining the details to set up this agreement with Public Works and Government Services Canada for the rare instances that this may occur. Could this declaration of equivalency also apply to clearances from State Nuclear Facilities or other Canadian federal agencies? Previous practice is that OPG cannot accept security clearance certificates from other organizations within Canada: for example, Transport Canada, Public Safety, RCMP, etc. OPG requests this be taken into consideration before making recommendations in this guidance document on accepting NATO clearances.	CNSC has removed this section.
25.	5.2.4 para #1	OPG	OPG receives a report from a trusted third party for education / employment verification which is	Text has been clarified to allow the licensee to use an internal form or record.

	Section	Organization	Comment	CNSC Response
			kept on file for audit purposes. OPG has an internal form that is initialed and dated to indicate that education /employment verification has been completed. This form is kept on file for audit purposes.	
26.	5.2.5 para #2	OPG	OPG requests that the word "will" be changed to "may", as OPG has threshold criteria in place to deem an applicant acceptable, acceptable with restrictions, or denied which initiates an appeal process.	To address this comment additional text has been added to the paragraph in question as follows: “or an alternate process that suitably assesses risk”.
27.	5.2.5. para #3	OPG	OPG has policies and procedures which include an assessment of risk prior to granting a SASC, with or without restrictions. OPG Security Clearance Office is only notified of transfers on a periodic basis. To impose a requirement that all transfers within OPG are reassessed for risk would be an unnecessary administrative burden. OPG policies currently stipulate that managers are accountable to ensure clearance levels are congruent with assigned duties; including new duties as a result of a transfer.	The requirement is only for those personnel that have a criminal conviction record who are being transferred to an assignment or position that requires access to sensitive information, assets or vital areas. It is assumed that this would only be a small number of OPG staff. A manager may or may not be aware of whether someone had a criminal conviction record. The new text reads: “The transfer of an individual within a high-security site should trigger a process to assess risk”.
28.	5.3.2 para #2	OPG	OPG requests that the word "will" be changed to "may". For addition information on this comment, please refer to comment for item number 23.	To address this comment additional text has been added to the second sentence in question (section 5.3.2 – para # 2) as follows: “a security interview or an alternate process that suitably assesses risk”.
29.	5.3.2 para #3	OPG	OPG suggests that the wording noted below would be better suited for this section as a security interview may not be applicable in circumstances where alternate methods have suitably addressed the area of concern. OPG requests the wording be changed to: "The licensee should conduct a security interview or have measures in place to suitably address the following situations: • The resolution of incomplete or questionable documentation	To address this comment additional text has been added to the second sentence in question (section 5.3.2 – para # 2) as follows: “a security interview or an alternate process that suitably assesses risk”.

	Section	Organization	Comment	CNSC Response
			• Poor or questionable credit history • Indictable convictions • Past criminal activity • Less than five consecutive years of traceable history • Adverse or insufficient information from CSIS • Any other adverse information that has potential risk to site or national security"	
30.	5.3.5 para # 1	OPG	To improve clarity, OPG requests the wording be changed to "The licensee should have a documented process in place for conducting security interviews. This documentation and associated information should be suitablv protected and kept on file."	Agreed. The section has been clarified.
31.	5.6 para # 1	OPG	This will create an unnecessary administrative burden for OPG due to the volume of security clearances processed and the geographical distances which exist between many applicants and facilities.	It is essential to conduct this briefing as part of the SASC process. The document has been amended to allow this briefing to be conducted remotely (eg. teleconference to a person off-site) to reduce the administrative burden on the licensee. Document modified to include “remote briefing”.
32.	5.6 para # 2	OPG	OPG's established SASC program allows for access to Nuclear facilities, assets, systems, and information designated as OPG Confidential or higher, not GOC 'classified' information.	Agreed. The section has been clarified.. Individuals with a security clearance equivalent to a Level II, Secret may be required to access designated/classified information on a “need-to-know” basis.
33.	6.1 para #1, bullet # 3	OPG	OPG has proven processes in place to address police information that may indicate a security risk. OPG will either deny the clearance and accord the individual the right to appeal, or assign appropriate restrictions to mitigate the risk.	No response necessary, as OPG is merely stating its own internal procedures.
34.	6.2 para #1	OPG	It would be an unnecessary administrative burden, to both the utility and the Regulator, to notify the CNSC for all denials or revocations. OPG recommends this notification to the CNSC for denials or revocations be made on a case by	The section has been clarified. Furthermore section 6.3 has been created. Para. #2 of this new section clarifies CNSC expectations.

	Section	Organization	Comment	CNSC Response
			case basis, dependent upon the nature and seriousness of charges or convictions or level of threat or risk posed to site or national security.	
35.	8	Point Lepreau	The SASC of an individual may only be transferred between licensees, provided the following criteria have been met: #2 - The SASC was not terminated more than two years ago – clarify why a two year period when the SASC is valid with CSIS for five years and any adverse information on record will be obtained through a current CRNC the applicant will provide or that the licensee will obtain using a police service agency #3 – The individual is not due for updating, clarify how close to updating two, three, six months from renewal date	The section has been clarified. The bullets were re-written to be more easily read. The person is required to self-declare.
36.	8 para #1	OPG	OPG requests that the second sentence be revised as follows: "To the extent permitted by law, any adverse information and restrictions on the applicant should be shared between licensees during the transfer of a SASC."	The section has been clarified. to include the language requested by OPG.
37.	8 para #2, bullets 2 & 3	OPG	Bullet 2: OPG requests clarification of this limitation for circumstances where adverse information does not exist. Bullet 3: OPG requests confirmation on what documentation is required to accomplish this in order to ensure consistency amongst licensees.	CNSC has clarified this section. The bullets were re-written to be more easily read. The person is required to self-declare.
38.	10 para #1	OPG	OPG suggests removing the requirement for a formal debriefing as this will create an unnecessary administrative burden for OPG due to the volume of security clearances processed and the geographical disconnect between	It is essential to conduct this briefing as part of the SASC process. The document has been amended to allow this briefing to be conducted remotely (e.g. teleconference to a person off-site) to reduce the administrative burden on the licensee.

	Section	Organization	Comment	CNSC Response
			applicants and facilities.	
39.	Appendix D, Tables 1 & 2	OPG	OPG requires clarification on the intended comparison contained in Tables 1 &2.	This document was designed to assist licensees to understand the SASC process as it compares to the GOC screening process. Tables 1 and 2 are intended to clarify this comparison.