



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

November 14, 2016

Dear Mr. Torrie:

**Canadian Nuclear Association Comments on draft REGDOC-1.1.1 Licence to Prepare Site and Site Evaluation for New Reactor Facilities**

The Canadian Nuclear Association (CNA) is pleased to have the opportunity to comment on REGDOC-1.1.1. Our members include the operators of Canada's existing Nuclear Power Plants and the CNA is aware that those members intend to submit a list of detailed comments. This submission will be limited to highlighting a few key points:

- CNA members have noted that the document contains heavy overlap with other regulatory documents and provincial and federal requirements, particularly *REGDOC 2.9.1, Environmental Protection, Environmental Policy, Assessments and Protection Measures*. To enhance clarity of the applicable requirements, our members recommend including with these proposed requirements references to all other relevant regulatory documents in the existing suite wherever possible instead of reiterating licence requirements.
- The document should also present an implementation strategy that accounts for the development timelines for a new site, noting that some elements may not yet be available at the preliminary stages of a new build.
- Although CNA members appreciate the detailed nature of this document, we feel it should only identify requirements that are supplemental to the Environmental Assessment (EA) process, referencing back to EA guidance documents rather than reiterating requirements.
- The guidance document requires a new build have assessments and analysis available based on a detailed reactor design well before an applicant might reasonably be expected to have chosen a design. A general understanding of the prospective technology to be used should be sufficient at these early stages of a new build.

- The REGDOC does not fully cover all regulatory requirements from the General Nuclear Safety and Control Regulations and Class I Facilities Regulations. This leaves the industry and the CNSC open to court challenges by NGOs in regards to the issuance of site preparation licences due to missing information that is required by the regulations

Once again, we appreciate the opportunity to provide comment on this draft document and encourage the CNSC to continue to engage licensees further as these proposed REGDOCs are developed. If you require further information or have any questions regarding this submission, please feel free to contact me directly.

Yours sincerely,



Steve Coupland  
Director, Regulatory and Environmental Affairs  
Canadian Nuclear Association