

**Public Consultation**  
**Draft REGDOC-1.1.3, Licence Application Guide: Licence to Operate a Nuclear Power Plant**  
 May 31, 2016 – July 30, 2016

**Table A:** Comments on the “Request for Information” that was included for comment with the draft document:

	Reviewer	Section or Para. #	Reviewer’s Comment and Proposed Change	Response
I				No comments specific to the Request for Information statement were received. All comments received during public consultation are listed in Table B, below. Feedback on comments is listed in Table C.

**Table B:** Comments received on the draft document

	Reviewer	Section or Para. #	Reviewer’s Comment and Proposed Change	Response
1	OPG, Bruce Power	General comment from cover letters	<p>We fully support the CNSC's attempt to provide guidance and clarity for [this important process] [the process by which applicants complete their licence submissions]. A concise, user-friendly guide is a valuable tool to help licensees navigate the multi-faceted processes that govern our industry. However, following a joint review with our industry peers, we believe that this initial draft does not yet meet [this objective] [this standard]. In an attempt to be thorough for both existing and future licence applicants, CNSC staff has inadvertently complicated the guide and reduced its overall effectiveness.</p> <p>To help streamline and strengthen future versions, [Ontario Power Generation and its peers at Bruce Power and New Brunswick Power] [Bruce Power, Ontario Power Generation, and New Brunswick Power] have collaborated on a series of suggestions and comments, which are listed in [the attached table] [Attachment A]. We also offer our collective time and expertise to participate in a workshop with CNSC staff to review these suggestions and address outstanding concerns with other documents listed in this guide such as REGDOC 2.3.2, Accident Management Version 2.</p>	Thank you. The CNSC appreciates your time and consideration of the information in this draft document, and considers the comments received to be valuable input.
2	CNA	Request for workshop	The CNA would like to request a workshop to review industries comments. We believe that with some streamlining and clarifications this REG DOC can serve as a valuable tool for new licensees.	CNSC is pleased to respond to requests for workshops. A workshop will be organized and the date and other relevant information will be provided.

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	OPG, NB Power, Bruce Power		A workshop is requested to address this* and the other industry comments on this REGDOC.  [CNSC note: * see comment #37 in this consolidated table; requests for a workshop have been consolidated]	
3	OPG, Bruce Power	General comment from cover letters	<p><b>Separate guidance for existing licensees and new applicants</b></p> <p>As we have noted with some previous Regulatory Documents, the CNSC is trying to satisfy too many objectives with a single document. [As currently written, this draft attempts to integrate guidance for experienced operators seeking licence renewals with detailed instructions for new applicants requesting their first licence.] [This draft weaves guidance for experienced operators seeking licence renewals with detailed instructions for new applicants requesting their very first licence.] For instance, there are several references in this guide to REGDOC-2.5.2, which applies to the design of new nuclear power plants. Citing it in areas like Section 4.4.4, Hazard Analysis, unintentionally confuses requirements for new plants with those of existing ones.</p> <p>While the desire to have a single document for all applicants is understandable, the result is an overly-long guide that serves <u>neither</u> audience as well as intended. Given the very different level of guidance required for these distinct applicants, we recommend that the CNSC either produce separate guides for existing and new licensees or reformat this draft with a common introduction and two distinct appendices with the appropriate level of detail for [application for licence renewal versus a new licence] [each group].</p>	<p>No change to the structure (the information will continue to be presented in one regulatory document). However, the information contained in the document will be reviewed to ensure that the role of the information is clarified for new and existing facilities.</p> <p>No new requirements have been added. Overall, text will be reviewed for suitability for new and existing reactors. The role of specific regulatory documents that have been referenced in REGDOC-1.1.3 will be clarified where necessary.</p> <p>Specific references to REGDOC-2.5.2 have been removed, including that in section 4.4.4.</p> <p>New builds and existing licensees are addressed together in one document because the licensing basis is the same for both. New and existing licensees will have the same scope of application.</p>
4	CNA	General comment on applicability to both new applicants	While the CNA is supportive of the CNSC's attempt to provide guidance and clarity for this critical element of nuclear safety, we feel that the attempt to provide guidance for both new and renewing applications in a single document has inadvertently complicated this draft. It is our view that the CNSC and industry would be better served by creating two distinct	

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		and renewals	<p>documents. One a simplified version of this guide for renewals of existing nuclear power plants and the other a more detailed guide for first-time applicants.</p> <p>In addition, this guide contains numerous examples where the CNSC has inappropriately created new regulatory requirements through a guidance document. A guidance document should not set requirements. Requirements should be set through regulations. Guidance documents should provide advice on the interpretation of the regulations. The two types of documents serve two distinct and different purposes and regrettably there is an increasing blurring of the roles of the two documents.</p>	
5	<p>OPG</p> <hr/> <p>Bruce Power</p>	<p>General comments on guidance and requirements</p>	<p><b>Guidance on existing requirements versus setting new requirements</b></p> <p>Industry as a whole continues to have concerns where on occasion, a regulatory document appears to set new requirements, beyond those in the Act or Regulations, rather than providing guidance on how to apply or interpret those Regulations. In doing so, regulatory burden is increased, while the cost and benefit of such increased burden is not measured to see if these costs result in a commensurate benefit. Examples and suggestions for alternative language are provided in the attached table.</p> <hr/> <p><b>Guidelines are not requirements</b></p> <p>The draft guidance document inappropriately sets requirements. This has been a recurring issue in many recent documents. For one of several examples with respect to this guide, please see the final paragraph on page 9, which begins, "The <i>requirements</i> and guidance provided in this document ... " A guide is a guide and should remain just that. Requirements emanate from the Nuclear Safety and Control Regulations. We urge the CNSC to clarify this important distinction throughout the guide. Suggested language is offered in our detailed comments.</p>	<p>No change to the structure of the document. This regulatory document codifies the information needed to confirm that an application for a new or renewed licence for operating a nuclear power plant meets regulatory requirements.</p> <p>At the beginning of each section, this regulatory document cites the applicable regulations. For clarity, subsection 3(1.1) of the <i>General Nuclear Safety and Control Regulations</i> has been added to the list.</p> <p>In regard to setting requirements, individual comments will be considered.</p> <p>Requirements language (i.e., "shall") is used where necessary (e.g., regarding requirements for licence renewal, and for regulatory documents and standards that must be addressed in the application so they are incorporated into the licensing basis).</p>

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6	OPG	General comment on para-phrasing requirements or CSA standards	<p><b>Paraphrasing specific requirements</b></p> <p>If a requirement in this guide is covered by an existing code, CSA Standard, or Regulatory Document, we recommend simply referencing the applicable code, standard or document. It is not advisable to paraphrase the requirement. There are numerous occasions in this guide where regulatory requirements are cited and then are described in great detail. This is seen quite often in Section 4 and examples are provided in the attached table. Where requirements are paraphrased from other source documents, there is a risk that the paraphrased text can alter the original intent or lead to misinterpretations. This also introduces a configuration management challenge, where the text in this document could diverge from the text in revisions to source documents. Where CNSC specific expectations do not already exist in other documents, they can be included in this guide.</p>	<p>Text has been reviewed to address the intent of the comment; however, some text in REGDOC-1.1.3 is provided for context (to meet the CNSC's objective of clarity in describing what the application shall and should contain). Some of the CSA standards are CANDU-specific, and CNSC staff have provided technology neutral text.</p> <p>CSA standards that were reviewed include CSA N286-12 (Management System), N288.4 (Env Monitoring), N288.5 (Effluent Monitoring), N290.15 (SOE) and the design section (that links to N285 (pressure boundary) N287 (containment), N289 (seismic), N290 (safety and support systems) series standards), and no paraphrasing was identified. If industry can provide further examples, CNSC staff would be pleased to review those particular examples.</p>
	Bruce Power		<p><b>Do not paraphrase or specify process requirements</b></p> <p>Similarly, we encourage the CNSC to be precise in its language to ensure compliance. There are numerous occasions in this guide when regulatory requirements are cited and then described in great detail. At times, requirements are paraphrased, which can alter their original meaning or lead to misinterpretations. This is seen quite often in Section 4 and examples are provided in Attachment A.</p> <p>For clarity, if a requirement in this guide is covered by an existing code, CSA Standard or Regulatory Document, we recommend the CNSC simply reference the code, standard or document. There is no need to repeat, describe or paraphrase the requirement. Where CNSC expectations do not exist, those expectations can be included in this document as guidance.</p>	

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	CNA		<p>One of our concerns with the draft REG DOC is that there are numerous occasions within the document when the regulatory requirements listed are paraphrased from the Regulations, various REGDOCs and CSA standards. These requirements should not be paraphrased. It would be much simple and clearer if the guidance document simply referred to the specific REG DOC or CSA standard without paraphrasing. This would make compliance easier and avoid confusion. This comment could be applied as a general rule for all guidance documents.</p>	
7	Bruce Power	General comment on structure of the document	<p><b>Do not arrange the document according to Safety and Control Areas</b></p> <p>Bruce Power also has concerns with the forcing of requirements from the Regulations into the CNSC Safety and Control Areas. The concern stems from the fact that certain clauses of the regulations are noted in multiple Safety and Control Areas. For example, <i>General Nuclear Safety and Control Regulations</i> Section 3(1)(d) is quoted under 6 different Safety and Control Areas, similarly, Section 3(f) of the <i>Class I Nuclear Facility Regulations</i>, which covers the proposed worker health and safety policies and procedures, is also referenced under six different Safety and Control Areas. This will result in the unnecessary duplication of information within the application. Bruce Power also notes that Sections 7(i), (f) and (k) of the <i>Class I Nuclear Facility Regulations</i> are referenced in the REG DOC in sections 4.1 O and 4.11. These are requirements for a decommissioning licence and do not belong in this REGDOC.</p>	<p>No change to the general structure of the document. References to paragraphs 7(i), (f) and (k) of the <i>Class I Nuclear Facilities Regulations</i> have been removed.</p> <p>The CNSC has developed the Safety and Control Area framework and uses it extensively. The framework provides a comprehensive and understandable structure for the information required by the CNSC for licensing and compliance activities.</p> <p>The CNSC does not require licensees or applicants to structure their own documents according to the CNSC's SCA framework. The licensee or applicant may organize the information for their application within their own structure, and simply provide the CNSC with a mapping of the required information to the SCA framework.</p> <p>A new appendix A lists the SCAs applicable to the regulations.</p>

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8	OPG, NB Power, Bruce Power	General comment	<p><b>Industry Issue:</b> This guide repeatedly reiterates the need to demonstrate requirements for a licence.</p> <p><b>Suggested Change:</b> Requirements are built into our management system. Need to simplify how industry meets these requirements rather than attempt to paraphrase entire program(s).</p> <p><b>NOTE*</b> The risk of <b>PARAPHRASING</b> is recurring theme in this document, one that is also referenced in comments 5, [23 and 67] [24 and 68]</p> <p>[CNSC's note: numbering of comments has changed within this consolidated table].</p>	<p>No change to the structure of the document.</p> <p>Where necessary, information has been included to provide context (to meet the CNSC's objective of clarity in describing what the application shall and should contain). This text has been reviewed for paraphrasing. Some details in the document related to programs have been deleted or simplified in various parts of the document. See response to comment #6.</p>
9	OPG, NB Power, Bruce Power	General comments on references to other REGDOCs	<p><b>Industry Issue:</b> There is no reference to <i>GD-379 Guide for Applicants and Interveners Writing CNSC Commission Member Documents</i>.</p> <p><b>Suggested Change:</b> CNSC to include link to GD-379.</p>	<p>No change. REGDOC-3.4.1, <i>Guide for Applicants and Interveners Writing CNSC Commission Member Documents</i> (published in March 2017, replacing GD-379) is not relevant to writing a licence application to operate a nuclear power plant. If applicants wish to refer to REGDOC-3.4.1, that document is available on the CNSC website.</p> <p>If this comment is meant for confidentiality requirements, please see response to comment #10, below.</p>
	CNA		<p>CNA members feel REGDOC 2.3.2 Accident Management Version 2 needs to be removed from this guide. This version of the REG DOC inappropriately groups design basis events with severe accidents. These are two distinct entities and should not have combined requirements. Our members see no path to compliance with this document and suggest a workshop to discuss a path forward</p> <p>[CNSC note: see also comment #124 regarding REGDOC-2.3.2]</p>	<p>No change. REGDOC-2.3.2 version 2 has been approved by the Commission. CNSC staff are working with each licensee to implement REGDOC-2.3.2 version 2.</p>

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10	CNA	General comments on confidential information	<p>While, the CNA supports the CNSC's attempt to ensure open and transparent submissions there is clearly some information that needs to remain protected or otherwise confidential. The REGDOC should recognize this and exempt this information from the guidelines. Similarly, the CNA feels it is inappropriate to give out direct contact information for senior staff to the public. Corporate contact information should be sufficient.</p>	<p>Text has been moved earlier in the section to provide more emphasis and clarity, and to add “subject to confidentiality requirements” where appropriate.</p>
	OPG, NB Power, Bruce Power		<p><b>Industry Issue:</b> The application requires information that is protected or otherwise confidential. Except for security information there is no recognition of this, and the recent expectations on confidentiality of information is not acknowledged. Examples include simulator design, PSAs.</p> <p><b>Suggested Change:</b> REGDOC should recognize confidential/protected nature of some information requested up front and clearly exempt from the recent Guidelines document. Industry acknowledges the need for open, transparent submissions but must maintain confidentiality of some information. The recent guidance on this is proving awkward and confusing to implement.</p>	

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11	OPG, NB Power, Bruce Power	General comment  <b>MAJOR</b>	<p><b>Industry Issue:</b> Overall, this guide suggests too much documentation be submitted for a licence application. It includes a large volume of information that would be submitted with an initial application, and later updated through the Licence Condition Handbook (LCH) document version control process. Some information, such as safety analysis reports, has scheduled reporting requirements in accordance with REGDOC-3.1.1, which may not align with licensing.</p> <p><b>Suggested Change:</b> Throughout the document, clarity should be provided as to what information is required for an initial application and thereafter maintained via the LCH and not be re-submitted. The CNSC should also <u>streamline</u> exactly what it requires for a licence application.</p> <p><b>NOTE*</b> The CNSC should consider <b>differentiating between new applicants and those renewing licences</b>, either through separate documents or distinct appendices for these different audiences. This is a recurring theme touched upon in comments 14, 15, 24, 27, 38, 82, 85, 90, 104 and [105] [106].</p> <p><b>Impact on Industry:</b> Currently, all NPPs have existing licences, LCHs, mature designs and processes. Without this clear separation, confusion is introduced for the public, which should expect to be able to understand what a given application should include. As the REGDOC relies on a “graded approach,” there may be inconsistencies in interpretation between licensees, and within staff reviewing different renewal applications. As currently written, this guide adds unnecessary complication and burden to the relicensing process if any new requirements apply to a license renewal.</p>	<p>A number of revisions have been made to help address the intent of this comment.</p> <p>One of the intents behind this document is to provide clarity on the material that comprises part iii of the licensing basis. This is intended to increase regulatory efficiency and effectiveness, and provide a very clear basis for compliance.</p> <p>Minor change to wording in section 4.0, to clarify that applicants may provide a mapping to the existing information, as stated in section 4.0 on page 11:</p> <p>For cases where the applicant has previously submitted a <del>program</del> <b>documentation</b> to the CNSC, the applicant may reference <del>the-that</del> documentation and provide a mapping to the framework provided in this <del>document</del> <b>licence application guide</b> rather than resubmit the <del>program</del> <b>documentation</b>.</p> <p>Revisions to text in sections 2 and 4, and new appendix C, provide clarity on which documentation is required to be submitted or referenced (if previously submitted); however, the applicant is responsible for identifying whether they have previously submitted the information.</p>



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12	<p>OPG,                      NB Power,                      Bruce Power</p>	<p>General,                      especially                      Section 4  <b>MAJOR</b></p>	<p><b>Industry Issue:</b> Many requirements listed are taken from various REGDOCs and CSA Standards. These requirements should not be paraphrased.</p> <p><b>Suggested Change:</b> Simply refer to the specific REG DOC or CSA Standard without paraphrasing requirements. E.g. the requirements for current training programs at NPPS are documented in the CNSC's document REGDOC 2.2.2, Personnel Training. Simplify REGDOC 1.1.3 by removing any training related requirements that are in addition or contrary to those given in REGDOC 2.2.2.</p> <p><b>Impact on Industry:</b>                      OPG: All requirements for a specific topic should be provided in a single regulatory document. Having differing requirements in more than one document makes compliance difficult and complex.]</p> <p><b>NB Power and Bruce Power</b> [All requirements should be given] in a single regulatory document. Having differing requirements in more than one document makes compliance difficult and complex.]</p>	<p>See response to comment #6.</p> <p>For section 4.2.3, text has been revised.</p> <p>The additional text is provided for context (to meet the CNSC's objective of clarity in describing what the application shall and should contain).</p>

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13	OPG, NB Power, Bruce Power	Preface pg i <b>MAJOR</b>	<p><b>Industry Issue:</b> The preface states, ‘Regulatory document REGDOC-1.1.3, <i>Licence Application Guide: Licence to Operate a Nuclear Power Plant</i> sets out requirements and guidance on submitting a formal application to the CNSC to obtain a licence ...’</p> <p>A guide should not set new requirements. The requirements for the licence application come from the regulations. This REGDOC should be providing guidance on the interpretation of the Regulations and what is acceptable for submission to meet the regulations.</p> <p><b>Suggested Change:</b> Remove the statement on requirements and use wording similar to that used in Section 1.1 to say, ‘Regulatory document REGDOC-1.1.3, <i>Licence Application Guide: Licence to Operate a Nuclear Power Plant</i> sets out <del>requirements</del> <i>instructions, direction</i> and guidance on submitting a formal application to the CNSC to obtain a licence to operate an NPP in Canada, and identifies the information that should be included in the application.’</p> <p>Similarly, revise wording of 6<sup>th</sup> paragraph to say, “A graded approach, commensurate with risk, may be defined and used when applying the <del>requirements</del> <i>instructions, direction</i> and guidance contained in this regulatory document.”</p> <p><b>Impact on Industry:</b> Industry as a whole continues to have concerns where on occasion, a regulatory document appears to set new requirements, beyond those in the Act or Regulations, rather than providing guidance on how to apply or interpret those Regulations. In doing so, regulatory burden is increased, while the cost and benefit of such increased burden is not measured to see if these costs result in a commensurate benefit. [Specific examples are cited in this table with a suggested alternative language.] [Examples of this in this draft REGDOC, and suggested alternative language, is offered in our detailed comments.]</p>	<p>No change to preface. This text is standard in the preface of all regulatory documents.</p> <p>This regulatory document codifies the information needed to confirm that an application for a new or renewed licence for operating a nuclear power plant meets regulatory requirements.</p> <p>For clarity, subsection 3(1.1) of the <i>General Nuclear Safety and Control Regulations</i> has been added to the list of relevant legislation.</p>

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14	OPG, NB Power, Bruce Power	Preface pg i <b>MAJOR</b>	<p><b>Industry Issue:</b> [Regarding the statement that:] [It is not reasonable to state]</p> <p>“Licensees are expected to review and consider guidance; should they choose not to follow it, they should explain how their chosen alternate approach meets regulatory requirements. An applicant or licensee may put forward a case to demonstrate that the intent of a specification is addressed by other means and demonstrated with supportable evidence.”</p> <p><b>Suggested Change:</b> Industry continues to find that CNSC’s definition of guidance appears more like requirements.</p> <p>Revise wording to, ‘Licensees and applicants are expected to review and consider guidance; <del>should they choose not to follow it, they should explain how their chosen alternate approach meets regulatory requirements. An applicant or licensee may put forward a case to demonstrate that the intent of a specification is addressed by other means and demonstrated with supportable evidence</del>”</p> <p><b>Impact on Industry:</b> Licensees note that a similar statement appears in all REGDOCs. It puts an unreasonable onus on licensees to demonstrate not just how requirements are met, but also how guidance is met.</p> <p>Industry believes that guidance is meant to be guidance. If the licensee is required to meet guidance criteria (even by other means), then it is requirement, not guidance.</p>	<p>No change to preface. This text is standard in the preface of all regulatory documents.</p> <p>This regulatory document codifies the information needed to confirm that an application for a new or renewed licence for operating a nuclear power plant meets regulatory requirements.</p> <p>For clarity, subsection 3(1.1) of the <i>General Nuclear Safety and Control Regulations</i> has been added to the list of relevant legislation.</p>
15	OPG, NB Power, Bruce Power	Preface pg i	<p><b>Industry Issue:</b> Under <b>Important note</b>, indirect references are not automatically part of the licensing basis.</p> <p><b>Suggested Change:</b> Revise to say:</p> <p>“<b>Important note:</b> Where directly referenced in a licence, this document is part of the licensing basis for a regulated facility or activity.”</p>	<p>No change. This text is standard in all regulatory documents.</p>

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16	OPG, NB Power, Bruce Power	1.3 Page 2 <b>MAJOR</b>	<p><b>Industry Issue:</b> Industry has concerns with the line:                      “The applicant must also comply with all applicable laws and regulations at all jurisdictional levels, provided they do not conflict with the NSCA and the regulations made under the NSCA. The applicant is expected to notify CNSC staff of any conflicts and to address these on a case-by-case basis by working collaboratively with other agencies.”</p> <p>This places the onus on licensee to resolve conflicts between agencies with no authority to do so.</p> <p>It is incumbent on CNSC to ensure new regulatory requirements are not in conflict with existing laws and regulations to which its licensees are subject, and when such conflicts are identified, assist licensees in finding a resolution.</p> <p><b>Suggested Change:</b> Revise text so that the CNSC has the lead to help resolve issues with other regulatory agencies.</p> <p><b>Impact on Industry:</b> Licensees are willing to work in a collaborative manner, and historically have done so. However, should disagreement between various regulators not be resolved, the licensee has no authority to resolve, potentially leaving licensees in a no-win situation.</p>	<p>In section 1.3, the text has been revised to state:                      “The applicant must also comply with all applicable laws and regulations at all jurisdictional levels, provided they do not conflict with the NSCA and the regulations made under the NSCA. <del>The applicant is expected to notify CNSC staff of any conflicts</del> and to address these on a case-by-case basis by working collaboratively with other agencies to minimize duplicate or conflicting requirements. Some examples of other applicable legislation include the <i>Canada Labour Code</i>, the <i>Transportation of Dangerous Goods Act, 1992</i> and the <i>Fisheries Act</i>.”</p> <p>The sentence about “The applicant is expected to notify CNSC staff of any conflicts.” (shown in red, above) has been moved to section 2.2.</p>
17	CNA	1.3 Final paragraph	<p>Our members clearly acknowledge the need to comply with all applicable laws however we feel that the final paragraph of Section 1.3 needs to be revised. The way the paragraph currently reads, the onus is on the licensee to resolve conflicts between agencies. This put licensees in a difficult and unfair position as they clearly do not have the authority to do this. Our members are willing to work in a collaborative manner (and have historically done so) when jurisdictional issues arise but the onus should be on the CNSC to ensure new regulatory requirements are not in conflict with existing federal and provincial laws and regulations.</p>	

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18	OPG, NB Power, Bruce Power	2.2 paragraph 6, 1 <sup>st</sup> sentence. pg 3	<p><b>Industry Issue:</b> The word ‘limit’ in the PSR description creates a negative connotation when industry views PSRs as a tool for continuous improvement.</p> <p><b>Suggested Change:</b> Rewrite to say:                      “A PSR is used to determine the extent to which the nuclear power plant conforms to applicable regulatory requirements and to modern codes, standards and practices, and to identify any factors that <del>would limit</del> could be improved to support continued safe operation.’</p>	<p>Intent of comment has been addressed by revising the text slightly to be consistent with REGDOC-2.3.3, as follows:                      “A PSR is used to determine the extent to which the nuclear power plant conforms to applicable regulatory requirements and to modern codes, standards and practices, and to identify any factors that would limit its <del>continued</del> safe <b>long-term</b> operation.”</p>
19	OPG, NB Power, Bruce Power	2.2 paragraph 6, 2 <sup>nd</sup> sentence pg 3  <b>MAJOR</b>	<p><b>Industry Issue:</b> The requirements for the IIP are already stated in REGDOC 2.3.3. Potential inconsistency with REGDOC 2.3.3 and current practice.</p> <p><b>Suggested Change:</b> Rewrite to say:                      “In performing a PSR, the licensee is required to conduct comprehensive reviews, addressing all aspects of safety, in order to conduct a global assessment and develop an IIP that describes <del>the requirements for repairs, replacements and modifications</del> <b>safety improvements</b> to be carried out by the licensee during the next license period.</p> <p><b>Impact on Industry:</b> Original wording gives the impression that all repairs, replacements and modifications are in the IIP. It also has a very narrow view that IIP items are only related to the physical plant equipment. The IIP items could also be process or analysis improvements. The requirements for the IIP are already stated in REGDOC 2.3.3.</p>	<p>Text has been revised as suggested, with the additional deletion of “the” for improved readability.</p>
20	OPG, NB Power, Bruce Power	2.2 pg 4	<p><b>Industry Issue:</b> The title for REGDOC 2.3.3 is incorrect: mistakes Integrated Safety Reviews with Periodic Safety Reviews.</p> <p><b>Suggested Change:</b> Correct the title to <b>REGDOC 2.3.3: Periodic Safety Reviews</b></p>	<p>Thank you. Title has been revised.</p>

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21	OPG, NB Power, Bruce Power	2.2	<b>Industry Issue:</b> INFO-0756 R1 superseded by REGDOC-3.1.5  <b>Suggested Change:</b> Replace reference	It is assumed that the reference is to REGDOC-3.5.1. Thank you for catching that. The reference has been updated.
22	OPG, NB Power, Bruce Power	2.2  <b>MAJOR</b>	<b>Industry Issue:</b> Unlike an application for a new licence (24 months), the timing for the submission of an application for renewal of an existing licence is not specified.  <b>Suggested Change:</b> Suggest recommending that at least 12 months lead time be provided to the CNSC to address an application for renewal of an existing PROL.  This supports the need for separate instructions for new licenses versus license renewals.  <b>Impact on Industry:</b> [Need clarity and separate guidance for renewal of existing licences versus new licences.] [Need clarity on guidance for both renewal and new licences.]	Text has been revised to remove reference to the timelines for regulatory reviews.
23	OPG, NB Power, Bruce Power	2.2.2 Page 3, 2 <sup>nd</sup> last paragraph  <b>MAJOR</b>	<b>Industry Issue:</b> As written, the text could be misinterpreted to mean that a new PSR will always be completed prior to every licence renewal application.  That may be true in the case where licence duration is approximately 10 years long. However, if for some reason a licence application were filed for a 2 or 3 year period, it might be that a new PSR may not have been completed.  <b>Suggested Change:</b> “For the renewal of an existing licence, the applicant should provide information described in the licence application guide and the results of the integrated implementation plan (IIP) derived from the latest completed periodic safety review (PSR)  <b>Impact on Industry:</b> This could require licensees to do PSRs more frequently than the existing regulatory requirements at great cost.	Partly based on this comment, and taking other input into account, text has been revised and now states the following:  “For the renewal of an existing licence, the licensee typically conducts a periodic safety review (PSR). A PSR is used to determine the extent to which an existing NPP conforms to applicable regulatory requirements and to modern codes, standards and practices, and to identify any factors that would limit safe long-term operation. In performing a PSR, the licensee is required to conduct comprehensive reviews, addressing all aspects of safety, in order to conduct a global assessment and develop an integrated implementation plan (IIP) that describes safety improvements to be carried out by the licensee during the next licence period. ”

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24	OPG, NB Power, Bruce Power	2.2.2 Top of page 4	<p><b>Industry Issue:</b> States that the licence application should be completed in the official language of the applicant. This assumes that the applicant is Canadian, and that either French or English would be used. However, the prospective licensee may be from another country.</p> <p><b>Suggested change:</b> Revise to, "... shall be completed in either of Canada's official languages, that is, English or French."</p>	Text has been revised as suggested.
25	OPG, NB Power, Bruce Power	2.3 Page 4	<p><b>Industry Issue:</b> If electronic submission is encouraged, then printed, signed hard copies should not also be required.</p> <p><b>Suggested change:</b> Revise to allow either electronic or printed but not both</p>	Text has been revised to clarify that the licence application may be submitted in electronic OR printed format, at the applicant's discretion. If the applicant chooses to submit the application in printed (hardcopy) format, then two printed, signed copies are required.
26	OPG, NB Power, Bruce Power	3 <b>MAJOR</b>	<p><b>Industry Issue:</b> Industry believes that it [feels it's] inappropriate to give out direct contact information for senior staff to the public.</p> <p><b>Suggested change:</b> Remove this request or generalize it to corporate contact information.</p> <p><b>Impact on Industry:</b> For safety and privacy reasons, Industry feels direct contact information for senior staff should not be divulged to the public.</p>	<p>Text has been added to state that applicants may request that, for security reasons, this information be subject to confidentiality requirements. However, note that GNSCR 15(a) and (b) state:</p> <p>15 Every applicant for a licence and every licensee shall notify the Commission of</p> <p>(a) the persons who have authority to act for them in their dealings with the Commission;</p> <p>(b) the names and position titles of the persons who are responsible for the management and control of the licensed activity and the nuclear substance, nuclear facility, prescribed equipment or prescribed information encompassed by the licence;</p>

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27	OPG, NB Power, Bruce Power	3 Pg. 5-7	<p><b>Industry Issue:</b> It would be good to assign some nomenclature for all subsections of section 3.1 to 3.3 to help with the organization and review of the licence application.</p> <p><b>Suggested change:</b> Examples:</p> <p style="color: red;">3.1 Identification and contact information</p> <p style="color: red;">3.1.1 Current licence number (for renewal)</p> <p>or</p> <p style="color: red;">3.1 Identification and contact information</p> <p style="color: red;">a) Current licence number (for renewal)</p>	Numbering has been added to the subsections, at the request of the reviewers.
28	OPG, NB Power, Bruce Power	3	<p><b>Industry Issue:</b> There is a mixture of requirement and guidance in this section (i.e. some of the statements are to satisfy the GNSCR Section 15, but others are guidance) and there is no distinction between them. This happens elsewhere in the document and is confusing.</p> <p><b>Suggested change:</b> Separate or distinguish between requirement and guidance. Where a statement is there to satisfy a regulatory requirement, perhaps the regulatory requirement could be cited.</p>	<p>Text has been revised to address the intent of this comment. Where information is required by regulation, the text states “the applicant shall...” while other requested information states “the applicant should...”.</p> <p>A new appendix A maps the applicable regulations to the specific document sections and hence to the SCAs.</p>
29	OPG, NB Power, Bruce Power	3.1 Paragraphs 4 and 5	<p><b>Industry Issue:</b> “Notify the Commission within 15 days of any changes to this information.”</p> <p>What is the basis for this statement? This requirement only applies to the applicant authority and the persons who have authority to act, not to addresses and contact information. Paraphrasing the Regulations can change their meaning and cause confusion.</p> <p><b>Suggested change:</b> Use the wording from the regulations.</p>	Text has been revised to state “shall” in the two instances where the regulations require this step, and “should” in these two instances where the CNSC expects a timely response.



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30	NB Power, Bruce Power	3.1 and 4.1.3 Pages 6 and 13	<p><b>Industry Issue:</b> Section 4.1.3 repeats some of what was to be provided in Section 3.1</p> <p><b>Suggested change: Avoid repetition in the document</b></p> <p><b>Impact on Industry:</b> Examples of where requested information is repeated:</p> <p>Pg 6 "Identification of persons responsible for management and control of the licensed activity" and pg 13 "The applicant should document the organizational structure, including all positions with responsibilities for the management and control of the licensed activity"</p>	<p>No change. Sections 3 and 4 are two different sections of the document, and there are two different uses of the information.</p> <ul style="list-style-type: none"> <li>-Section 3 is where the applicant must provide the "general information" about the licence application; it is not asking for the organizational structure, just the names and contact info.</li> <li>-Section 4 is requesting the info for the management system SCA and is specifying the organizational structure.</li> </ul>
31	OPG, NB Power, Bruce Power	3.1 Paragraphs 13 and 15	<p><b>Industry Issue:</b> "Identification of persons responsible for management and control of the licensed activity"</p> <p>"Legal signing authority"</p> <p>Aren't these two designations the same?</p> <p><b>Suggested change:</b> Combine these paragraphs.</p>	<p>The paragraphs have not been combined. These two items of identification are not the same. The text has been revised to add clarity.</p>
32	OPG, NB Power, Bruce Power	3.2 Paragraphs 3 and 6  <b>MAJOR</b>	<p><b>Industry Issue:</b> "<b>Statement of the main purpose</b> Provide a summary of the main purpose, and a list of all activities to be licensed for this facility"</p> <p>"<b>Nuclear substances</b> Provide a list of any nuclear substance to be encompassed by the licence. Include the scientific name, the maximum quantity and the form of each nuclear substance."</p> <p>These statements are to satisfy the GNSCR Sections 3(1)(b) and (d) respectively but they are paraphrased.</p> <p><b>Suggested change:</b> Cite [Quote] the regulatory requirements; do not paraphrase.</p> <p><b>Impact on Industry:</b> Paraphrasing can change the meaning of the original statement.</p>	<p>Text has been revised to align with the wording in the regulations, as follows:</p> <ul style="list-style-type: none"> <li>- "The applicant shall provide a description of the activity to be licensed and its purpose, and a description of any nuclear facility, prescribed equipment or prescribed information to be encompassed by the licence."</li> <li>- "The applicant shall provide the name, maximum quantity and form of any nuclear substance to be encompassed by the licence."</li> </ul> <p>In the first item, the requirement comes from GNSCR 3(1)(b) and (d). In the second item, the requirement comes from GNSCR 3(1)(c). Note that in the second item, text has been added to provide guidance that the applicant should provide the "scientific name" of each nuclear substance.</p>

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33	OPG, NB Power, Bruce Power	3.3 Paragraph 3	<p><b>Industry Issue: "Similar facilities</b>                      Provide a list of any similar facilities owned or operated by the applicant that have been assessed and licensed by either the CNSC or any foreign national regulatory body, and a description of the main differences or design improvements made since that earlier licence was granted. Include the following information:"</p> <p>This guidance could apply for a <b>new licence</b> but is not necessary for a license renewal of an <b>existing</b> facility.</p> <p><b>Suggested change:</b> Modify to address [as noted in] industry issue.</p>	Text has been revised to include the phrases "(for a licence application for a new facility)" and "If this licence application is for a new facility".

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34	OPG, NB Power, Bruce Power	3 and 4.1	<p><b>Industry Issue:</b> This section addresses the requirements of the following regulations made under the NSCA:</p> <ul style="list-style-type: none"> <li>-General Nuclear Safety and Control Regulations, paragraphs 3(1)(a), (b), (c), (k) and (m) and sections 15 and 27</li> <li>-Class I Nuclear Facilities Regulations, paragraphs 3(c), (i) and (j)</li> </ul> <p>The licence application <b>should</b> include the following general information”</p> <p><b>Suggested change:</b> “Should” is used in some cases where reference is made to satisfying the regulations. In these cases it needs to be “shall”.</p> <p>[NB Power, Bruce Power added:] Examples of where "should" is used inappropriately are:</p> <ul style="list-style-type: none"> <li>- Pg 5, "The licence application should include the following general information". Section 3.1 goes on to include "All persons who have authority to interact for the applicant with the CNSC" and "All persons who have authority to interact for the applicant with the CNSC". These are requirements of the GNSCR section 15.</li> <li>- Pg 33, "The information submitted should demonstrate that, in all operational states, radiation doses within the plant or any planned release of radioactive material from the plant are kept below regulatory limits and are as low as reasonably achievable (ALARA}." This is a requirement of the RPRs section 4.</li> </ul>	<p>Text has been revised to state “The licence application shall include the following general information to satisfy the regulations, and should also include some additional general information as listed below.”</p> <p>In addition, the following statement has been added: “The applicant may identify appropriate information and documents as being subject to confidentiality requirements.”</p> <p>In section 4.5.3, subsection “Radiation Protection” (page 33 in the draft regulatory document), the text has been changed from “should” to “shall” as suggested.</p>

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35	OPG, NB Power, Bruce Power	4 Pg. 9 , last paragraph  <b>MAJOR</b>	<p><b>Industry Issue:</b> Remove the reference to requirement in the following statement:                      “The <b>requirements</b> and guidance provided in this document do not prevent applicants from proposing alternatives, but any proposal should appropriately reflect the complexities and hazards of the activities described in the application.”</p> <p><b>Suggested change:</b> Remove the statement on requirements and suggest using wording similar to that in Section 1.1 to say:</p> <p>““The <del>requirements</del> <i>instructions, direction</i> and guidance provided in this document do not prevent applicants from proposing alternatives, but any proposal should appropriately reflect the complexities and hazards of the activities described in the application.”</p> <p><b>Impact on Industry:</b> A Guide should not set requirements. The requirements for the licence application come from the Regulations, this REGDOC should be providing guidance on the interpretation of the Regulations and what is acceptable for submission to meet the Regulations.</p>	<p>The text has been rewritten to state:</p> <p>“The applicant may choose to organize their information in any structure. However, the applicant is encouraged to organize the licence application according to the CNSC’s SCA framework so as to facilitate the CNSC’s review.”</p> <p>Note that this text has also been moved into section 2.</p>
36	OPG, NB Power, Bruce Power	4 Bottom of p.10, 2 <sup>nd</sup> last paragraph	<p><b>Industry Issue:</b> Refers to an environmental impact statement (EIS), but a licence renewal for an existing NPP does not need an EIS.</p> <p><b>Suggested change:</b> Delete mention of EIS in this paragraph.</p>	The paragraph has been removed.

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37	OPG, NB Power, Bruce Power	4 page 10 <b>MAJOR</b>	<p><b>Industry Issue:</b> The use of Appendices to note CNSC REGDOCs and other codes and standards will be problematic. These documents frequently change and, in some cases, there are disagreements about whether they should be incorporated into the licensing basis. Currently, some of these documents are not in the licensing basis</p> <p><b>Suggested change:</b> Discussions on the management of the Appendix B documents should occur between the Licensees and the CNSC.</p> <p>A workshop is requested to address this and the other industry comments on this REGDOC.</p> <p><b>Impact on Industry:</b> Review and implementation of new REGDOCs is a costly endeavour. There needs to be a demonstrable safety benefit to including REGDOCs, codes and standards in the licence. In particular ones such as REGDOC 2.3.2 Accident Management Version 2 which as written requires significant changes to the ways licensees handle anticipated operational occurrences and design basis accidents. There needs to be some type of change control on the Appendices that allow for licensee input.</p>	<p>The draft appendix B is now appendix C (added a new appendix A). The list of documents in Tables C1 (was B1) and C2 (was B2) have been reviewed and adjusted for consistency.</p> <ul style="list-style-type: none"> <li>- Table C1 represents CNSC position on what documents must be addressed by applicants so that they are clearly part of the licensing basis.</li> <li>- Table C2 lists those that are to be considered as a modern standard in a Periodic Safety Review for a licence renewal.</li> <li>- Table C3 lists additional guidance.</li> </ul> <p>The tables will be updated as necessary under the CNSC's regulatory framework, and with supplemental guidance, and communication with licensees on an on-going basis.</p> <p>REGDOC-2.3.2, version 2, will be addressed as specified in the response to comment #9.</p> <p>Note the the text under discussion has been moved from section 4 to section 2.</p>

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38	OPG, NB Power, Bruce Power	4 page 10 paragraph 3  <b>MAJOR</b>	<p><b>Industry Issue:</b> “The applicant <u>shall</u> submit improvement plans and significant activities to be carried out during the proposed licence period. These improvements ...”</p> <p>“The applicant <u>shall</u> provide a statement of performance assessment that includes significant findings and lessons learned over ...”</p> <p>A guide should not create requirements.</p> <p><b>Suggested change:</b> Change the “shall” to “should”.</p> <p>Also, this information will typically be proprietary. The guide needs to refer to the CNSC letter on confidential filings: M. Leblanc to F. Saunders, January 5, 2015, " CNSC Guidance Document on Confidential Filings"</p> <p><b>Impact on Industry:</b> These requirements are beyond what is required in the regulations.</p>	<p>No change. It is standard practice that applicants submit this information. In general, station improvement plans should not be proprietary (although some details may be considered confidential).</p> <p>For additional information, please refer to the response to the previous comment.</p> <p>Note the the text under discussion has been moved from section 4 to section 2.</p>
39	OPG, NB Power, Bruce Power	4 page 10 paragraph 3  <b>MAJOR</b>	<p><b>Industry Issue:</b> “... results from any environmental assessments (EAs) conducted in support of this application or a previous application”</p> <p>Why are results from previous EAs to be included?</p> <p><b>Suggested change:</b> Delete</p> <p><b>Impact on Industry:</b> This is a [new] requirement created by the guide and it shouldn't be.</p>	<p>Text has been revised to state:</p> <ul style="list-style-type: none"> <li>• how the applicant:             <ul style="list-style-type: none"> <li>• has addressed any follow-up actions from any environmental assessments (EAs) conducted during the current licensing period</li> <li>• will address any on-going or outstanding follow-up actions</li> </ul> </li> </ul> <p>Note the the text under discussion has been moved from section 4 to section 2.</p>

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40	OPG, NB Power, Bruce Power	4.1 Page 12	<p><b>Industry Issue:</b> Language is inconsistent with Section 4.1.2 of <i>CSA N286-12, Requirements for an integrated management system.</i></p> <p><b>Suggested change:</b> Align with language in N286-12 standard to ensure consistency of understanding, implementation and application by saying:</p> <p>“The management system SCA covers the framework that establishes the processes and programs required to ensure an organization achieves its <del>safety objectives</del> <b>health, safety, security, environment, quality, and economic (with regards to safe operations)</b> objectives, continuously monitors its performance against these objectives, and fosters a healthy safety culture.”</p>	No change. This text is quoted from the CNSC’s “Safety and Control Framework” (eDoc 3410839) that describes the safety and control areas with subject areas. Any change to this text must be approved by CNSC’s <a href="#">Operations Management Committee</a> .
41	OPG, NB Power, Bruce Power	4.1.1 Page 12	<p><b>Industry Issue:</b> Intent is unclear in the sentence:</p> <p>“The application should also describe the safety policies, the roles of safety assessment organizations ...”</p> <p><b>[Suggested change:]</b> Use of organization implies external to the applicant, is that the intent?</p>	Text has been revised to state “the roles of <b>external</b> safety assessment organizations, and...”
42	OPG, NB Power, Bruce Power	4.1.2 Page 12	<p><b>Industry Issue:</b> Unclear what is meant by observance in the sentence:</p> <p>“The application should describe the measures taken to ensure the implementation and <b>observance</b> of the management system procedures.”</p> <p><b>[Suggested change:]</b> What does “observance” mean in this context?</p>	The phrase “and observance” has been deleted.

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43	OPG, NB Power, Bruce Power	4.1.2 Page 12	<p><b>Industry Issue:</b> There is inadequate flexibility in the first sentence of the fifth paragraph. Management doesn't typically publicize statements on its safety culture in the way it publicizes its core values. Also, not all organizations <b>may have all elements described, e.g. a licensee may not have "guiding principles" but would have "Behaviours," so there needs to be some flexibility.</b></p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>"The application should describe how management will make its high-level expectations clear to all personnel, through formal and well-publicized statements on <b>elements of its management system such as</b> its vision, mission, core values, guiding principles, safety policy <b>and commitment to foster a healthy</b> safety culture.</p>	Text has been revised as suggested.
44	OPG, NB Power, Bruce Power	4.1.2 Page 12	<p><b>Industry Issue:</b> Fifth paragraph, second sentence, is unclear when it refers to personnel responsible for compliance.</p> <p>If this truly means "personnel responsible for compliance" it means those "implementing" the process. It is not clear why they would need access to senior levels of the structure. If this is intended to mean "personnel responsible for <i>checking</i> compliance," this statement makes more sense in terms of reporting on compliance to senior levels.</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>"The applicant should confirm that personnel responsible for <b>checking</b> compliance have access, whenever required, to senior levels of the applicant's management structure.'</p> <p>This is another example of [the CNSC has reproduced] where we are reproducing the requirements in this document rather than referring to the actual standards.</p>	Text has been revised as suggested.



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45	OPG, NB Power, Bruce Power	4.1.2 Page 12	<p><b>Industry Issue:</b> Use of the word ‘program’ in the sixth paragraph may be imprecise. Not all licensees may have a “program.”</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>“The applicant should describe the procurement <del>program</del> <b>approach/process/ governance</b> for licensed activity use.”</p>	Text has been revised to state “describe the procurement <del>program</del> <b>approach, process or governance</b> for <b>use in the licensed activity...</b> ”
46	OPG, NB Power, Bruce Power	4.1.2 Page 13, first paragraph	<p><b>Industry Issue:</b> Lack of clarity with the statement:</p> <p>““The application should explain the steps to be taken and the measures implemented to assure that applicable specifications of each good or service to be procured are met.”</p> <p>This could be extremely onerous to explain the steps to assure applicable specification of <b>EACH</b> good or service to be procured are met</p> <p><b>Suggested change:</b> Replace: “of each good and service,” with “for goods and services.”</p>	Text has been revised as suggested.
47	OPG, NB Power, Bruce Power	4.1.3 Page 13, second paragraph	<p><b>Industry Issue:</b> Clarification required for the lines, “The application should describe:</p> <ul style="list-style-type: none"> <li>•the roles and responsibilities of each component within the applicant’s organization, and the qualifications for each component, including those of the oversight bodies (for example, safety committees, advisory panels)</li> <li>•the approach, programs and processes proposed for staffing and service procurement</li> <li>•the monitoring and management of contractors”</li> </ul> <p><b>Suggested change:</b> This should only apply to a new license application and not a renewal for existing facilities because it is redundant to documentation in the LCH of existing facilities.</p>	<p>Relevant text is now located in section 2, and has been edited for clarity and completeness.</p> <p>The CNSC acknowledges that, for existing licensees, much of the information has already been submitted. Appendix D has been added that includes a tabular format for organizing the documents to be submitted. The table has a column to indicate those documents that are already listed in existing LCHs.</p>

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48	OPG, NB Power, Bruce Power	4.1.3 Page 13	<p><b>Industry Issue:</b> The first sentence is too far reaching. If you put all the positions with responsibility for control of licensed activity, you potentially go to individual contributor level. Suggest it be kept to the leadership level with authority to assure the responsibilities defined for workers in the management system are defined.</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>“The applicant should document the organizational structure, including all positions with <b>responsibilities authority</b> for the management and control of the licensed activity.”</p>	<p>Text has been revised to clarify that the intent is to capture the organizational level (i.e., the titles of the responsible persons), not necessarily all the personal names of the persons. It is important to point out key control positions if they are not management positions.</p> <p>“The applicant should document the organizational structure, including <b>the titles of</b> all <b>key</b> positions with responsibilities for the management and control of the licensed activity.”</p>
49	OPG, NB Power, Bruce Power	4.1.3 Page 13	<p><b>Industry Issue:</b> “... including all positions with responsibilities for the management and control of the licensed activity”</p> <p>This is repeated from paragraph 3 on pg 6.</p> <p><b>Suggested change:</b> Remove duplication in the document.</p>	No change. See response to comment #30.
50	OPG, NB Power, Bruce Power	4.1.3 Page 13	<p><b>Industry Issue:</b> First bullet, second paragraph, is unclear when it says, ‘the roles and responsibilities of each component within the applicant’s organization, and the qualifications for each component, including those of the oversight bodies (for example, safety committees, advisory panels)</p> <p><b>[Suggested change:]</b> What are ‘components’ in this context? Organization units or something more/other? People are qualified, not components.</p>	To improve clarity, the word “component” has been replaced with “organizational element” and “qualifications for each component” with “qualifications of staff”.

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51	OPG, NB Power, Bruce Power	4.1.4 Page 13	<p><b>Industry Issue:</b> Unclear what is meant by ‘review program’ in the first paragraph, which reads, ‘The applicant should describe the audit and review program. The applicant should provide sufficient objective evidence from the audit and review program to demonstrate that the safety policy is implemented effectively.’</p> <p><b>Suggested change:</b> Clarify what is meant by “review program,” [e.g.] “Audit” is understood.</p>	<p>Text has been revised to clarify that the “review program” refers to the “management review” mentioned in the title “Performance assessment, improvement and management review”:</p> <p>The applicant should describe the <del>audit</del> <b>programs covering performance assessment, improvement and management review program</b>. The applicant should provide sufficient objective evidence from the <del>audit and review programs</del> to demonstrate that the safety policy is implemented effectively.</p>
52	OPG, NB Power, Bruce Power	4.1.4 Page 13  <b>MAJOR</b>	<p><b>Industry Issue:</b> This section contains discussion on what licensee programs need to contain or accomplish. This is not the right document for that sort of content.</p> <p><b>Suggested change:</b> This guide should simply state what the application needs to contain. For example, “The application should describe how organizational effectiveness and safety performance are measured, including the development of performance indicators.</p> <p><b>Impact on Industry:</b> As currently written, this guide strays too far from its intended focus when it seeks to describe or discuss licensee program content. This guide should be refined to state only what the application must contain.</p>	<p>Text has been revised as follows:</p> <ol style="list-style-type: none"> <li>1. “The application should describe how organizational effectiveness and safety performance are measured, including the <del>development</del><b>use</b> of performance indicators. <del>The indicators should be used</del> to detect any shortcomings and deteriorations in safety <del>such that they will be addressed in a timely manner</del>.”</li> <li>2. From:                      “The program should ensure that any development or change in organization that could lead to the degradation of safety performance during plant operation is identified. Measures should be in place to prevent such degradation.”                      To:                      “The application should describe how organizational changes are managed to prevent degradation of safety performance.”</li> </ol>
53	OPG, NB Power, Bruce Power	4.1.4 Page 13	<p><b>Industry Issue:</b> Unclear what is being referenced in the fourth paragraph, which begins, ‘The program should ensure that....’</p> <p><b>Suggested change:</b> Rather than use the term “program” suggest using the term “process.”</p>	<p>Text has been changed as a result of addressing comment #52.</p>

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54	OPG, NB Power, Bruce Power	4.1.4 Page 13	<p><b>Industry Issue:</b> The fifth paragraph is too far reaching.</p> <p>Where is consideration of the graded approach? The human factors inclusion is a significant change.</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>“The applicant should demonstrate that the analysis of the causes of <b>all significant</b> incidents and events will consider technical, organizational and human factors aspects, and that the necessary arrangements have been made to report and analyze near-miss events.”</p>	Text has been revised as suggested.
55	OPG, NB Power, Bruce Power	4.1.6 Paragraph 2	<p><b>Industry Issue:</b> Clarify line, “The applicant should demonstrate that processes are in place to evaluate the safety significance of proposed modifications, including the requirements for seeking CNSC approvals where necessary.” Some modifications only require notification.</p> <p>NOTE: This is a good example where process is used properly rather than program, as per comment 44 [and 45 (Bruce Power)].</p> <p><b>Suggested change:</b> Revise to:</p> <p>“The applicant should demonstrate that processes are in place to evaluate the safety significance of proposed modifications, including the requirements for seeking CNSC approvals <b>or providing notification</b> where necessary.</p>	Text has been revised as suggested.

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56	OPG, NB Power, Bruce Power	4.1.6 Paragraph 3  <b>MAJOR</b>	<p><b>Industry Issue:</b> “Any modifications to SSCs are subject to approval by an authorized inspection agency acceptable to the CNSC.”</p> <p>This statement is not correct and is beyond the scope of what this document should include. For example, changes to code class do not require AIA acceptance.</p> <p><b>Suggested change:</b> Delete statement.</p> <p><b>Impact on Industry:</b> This statement is not correct and is beyond the scope of what this document should include.</p>	Text has been modified to remove the sentence “Any modifications to SSCs are subject to approval by an authorized inspection agency acceptable to the CNSC.”
57	OPG, NB Power, Bruce Power	4.1.6 Page 14 3 <sup>rd</sup> paragraph	<p><b>Industry Issue:</b> [Third paragraph] Imprecise use of the word <b>program</b>. Doesn't need to be called a 'program'</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>“For pressure boundary SSCs, the application should describe the arrangements that have been made to ensure the related quality assurance <del>program</del> requirements are established in governance, ...”</p>	Text has been revised as suggested.
58	OPG, NB Power, Bruce Power	4.1.7 Page 15	<p><b>Industry Issue:</b> Imprecise use of the word <b>program</b> in first sentence. Licensees do not have standalone safety culture programs, but elements throughout all parts their organizations that promote a healthy safety culture.</p> <p><b>Suggested change:</b> Revise to:</p> <p>“The applicant should demonstrate that the following elements and characteristics are <del>included in a</del> addressed in support of a healthy safety culture.<del>program.</del>”</p>	Text has been revised as suggested.

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59	OPG, NB Power, Bruce Power	4.1.7 Page 15	<p><b>Industry Issue:</b> Inconsistent use of language with N286-12 in fourth bullet. Use N286-12 language for consistency. Priorities change and the language of safety and safety culture is about consideration rather than prioritization</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>“safety culture applies throughout the organization; i.e., everyone in the organization has an obligation to ensure that safety is the <del>top priority</del> <b>paramount consideration guiding decisions and actions.</b>”</p>	Text has been revised as suggested.
60	OPG, NB Power, Bruce Power	4.1.7 Page 15	<p><b>Industry Issue:</b> The use of the word <b>continually</b> in the third paragraph is too far reaching. Continually promoted and assessed is a difficult burden of proof....</p> <p><b>Suggested change:</b> Rewrite to say:</p> <p>“The application should clearly state how safety culture will be <del>continually</del> promoted and <b>regularly</b> assessed throughout the organization.”</p>	Text has been revised as suggested.
61	OPG, NB Power, Bruce Power	4.1.8 and 4.1.9  <b>MAJOR</b>	<p><b>Industry Issue:</b> Both sections include statements about what a licensee program is to contain or accomplish. This is beyond the scope of what should be in this document. See the similar comment in section 4.1.4</p> <p><b>Suggested change:</b> If the requirements identified in this document are included in existing Codes/Standards/REGDOCs then they should <b>not</b> be included in this document. Preferably, the applicable code/REGDOC/standard should BE referred to in this document.</p> <p>Only if the CNSC identifies additional GUIDANCE outside existing codes, REGDOCS and standards should the details be listed in this document.</p> <p><b>Impact on Industry:</b> See the similar comment in section 4.1.4</p>	The text has been revised by removing the second sentence in the first paragraph of section 4.1.8 (“The description should include the measures for creating, ... to plant operation”).

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62	OPG, NB Power, Bruce Power	4.1.9 Page 15  <b>MAJOR</b>	<p><b>Industry Issue:</b> There is no requirement in the regulations for the submission of a business continuity plan.</p> <p>Pandemic plans are generally a subset of other continuity plans, although some licensees may choose to have them separated. Continuity plans may address all potential calamities where staffing of key positions could be challenged.</p> <p><b>Suggested change:</b> Delete Section 4.1.9</p> <p><b>Impact on Industry:</b> This requirement goes beyond the requirements of the regulations. The Licence Application Guide should not be setting requirements.</p>	<p>Text has been revised:</p> <p>FROM:                      “The applicant should submit a business continuity plan, a pandemic plan and a contingency plan to deal with possible labour disruptions while maintaining staffing of key positions in support of the minimum shift complement.”                      Also, the second para, about pandemic plan, has been deleted.</p> <p>TO:                      “The applicant should submit a business continuity plan. This plan should include contingency provisions for pandemics and for possible labour disruptions while maintaining staffing of key positions in support of the minimum shift complement.”</p> <p>Note that it is standard practice that applicants submit this information. A request for a pandemic plan is included in the most-recent licence renewal letter sent to OPG Pickering.</p>
63	OPG, NB Power, Bruce Power	4.2.1 Succession Planning	<p><b>Industry Issue:</b> Succession planning is an internal and confidential process. Providing the succession plan it is not appropriate, however describing the process is reasonable.</p> <p>It would be more accurate to refer to the workforce planning process. A succession plan is generally used for specific individuals and positions, while the workforce plan looks at the entire organization.</p> <p><b>Suggested change:</b> Revise “the succession plan” to “the workforce planning process”</p> <p>Application should provide process only, not the specific details.</p>	<p>Text has been revised as suggested.</p>

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64	OPG, NB Power, Bruce Power	Section 4.2.1	<p><b>Industry Issue:</b> Listing all staff and contractors skills and competencies would be impractical</p> <p><b>Suggested change:</b> “The application should describe the qualifications, adequate numbers, skills and competencies required by personnel <del>(both staff and contractors)</del> at the facility.”</p>	Text has been revised as suggested.
65	OPG, NB Power, Bruce Power	Section 4.2.3 First paragraph, p. 16  <b>MAJOR</b>	<p><b>Industry Issue:</b> The wording of REGDOC 1.1.3 does not align with REGDOC 2.2.2, in that the terms “<i>safety-sensitive occupations and/or safety-sensitive positions</i>” were removed from 2.2.2 during the stakeholder consultation phase of the document preparation.</p> <p><b>Suggested change:</b> Align the wording of REGDOC 1.1.3 to the wording used in REGDOC 2.2.2. For example:</p> <p><i>“This includes workers in positions where the consequence of human error poses a risk to the environment, the health and safety of persons, or to the security of the nuclear facilities and of nuclear substances. The licensees shall define these positions in their training system governing documents.”</i></p> <p><b>Impact on Industry:</b> As identified to the CNSC during the comment period for REGDOC 2.2.2, the use of the wording “<i>safety-sensitive occupations and/or safety-sensitive positions</i>” increases the cost and burden to licensees by adding large numbers of jobs/positions that will require the use of a formal Systematic Approach to Training.</p>	<p>Text in section 4.2.3 has been replaced with the following:</p> <p>The application shall describe a training system that is in accordance with REGDOC-2.2.2, <i>Personnel Training</i>, version 2 [5].</p> <p>The applicant should submit a description of the full-scope training simulator used for the facility and the manner in which the simulator will be used to support operation.</p> <p><del>The training programs and facilities, including simulator facilities, should reflect the operating status of the plant. The application should describe the provisions to ensure that, as the facility undergoes physical changes during operation or changes to operational state, the training programs will be revised to accommodate these changes. The applicant should include information on how such changes are captured and reviewed and how the training program is modified appropriately</del></p> <p>The application shall include the applicant’s overall training policy and all governance documents (or a</p>



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66	OPG, NB Power	Section 4.2.3 p. 17 Last paragraph  <b>MAJOR</b>	<p><b>Industry Issue:</b> The requirement to complete a training needs analysis is included in REGDOC 2.2.2.</p> <p><b>Suggested change:</b> Delete this paragraph.</p> <p><b>Impact on Industry:</b> All requirements should be given in a single Regulatory document.</p>	<p>description) related to the training system, including the list of occupations or positions. The application shall include descriptions of the initial and continuing training programs for all workers engaged in licensed activities, including workers employed as trainers and instructional staff.</p> <p>The application should describe the processes established to:</p> <ul style="list-style-type: none"> <li>• develop and manage documentation related to all phases of training including analysis, design, development, implementation and evaluation.</li> <li>• manage training change control.</li> <li>• manage and track the status of staff and contractor qualifications</li> </ul>
67	OPG, NB Power, Bruce Power	Section 4.2.4 p. 17 First paragraph, And Section 4.2.5 p. 18 First paragraph,	<p><b>Industry Issue:</b> The requirement to comply with RD-204 may be difficult or impossible for a non-CANDU NPP licensee. Cost and burden to a non-CANDU NPP may be excessive, if required to meet the current CANDU requirements. Detailed lists and processes do not belong in a REGDOC such as RD-204.</p> <p><b>Suggested change:</b> Modify the document to clearly identify the minimum requirements for positions requiring certification. Revise RD-204 so that it is applicable to all types of NPPS. Rewrite [REGDOC-204] [that REGDOC] to a much higher level document.</p>	<p>No change. RD-204, <i>Certification of Persons Working at Nuclear Power Plants</i> makes no reference to CANDU technology but does provide for general requirements. RD-204 remains a requirement for existing NPPs and will form the basis for applicants for new NPPs to customize requirements jointly with the CNSC's Personnel Certification Division (PCD). For new NPPs, compliance with RD-204 will be evaluated on a case-by-case basis, in a risk-informed, graded approach.</p> <p>RD-204 is currently under revision and will be published as a REGDOC.</p>

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68	OPG, NB Power, Bruce Power	Section 4.2.4 p. 17 Third paragraph.	<p><b>Industry Issue:</b> The last sentence is unclear when it says,:</p> <p>“The application should include information on the personnel required for certification-related activities on the full-scope training simulator.”</p> <p>Cost and burden may be excessive if the list is unbounded.</p> <p><b>Suggested change:</b> Revise to clearly specify which personnel the document is referring to, e.g. trainers, maintainers, etc.</p>	<p>The text has been revised as follows:</p> <p>“The application should include information on <b>the qualifications of</b> the personnel required <del>for</del> <b>to conduct</b> certification-related activities <b>training and testing</b> on the full-scope training simulator.”</p>
69	OPG, NB Power, Bruce Power	Section 4.2.4 p. 17, last paragraph.	<p><b>Industry Issue:</b> The last paragraph is unclear, in that it first mentions certified staff to support training, and then mentions programs to ensure only certified staff are assigned to operating positions. Cost and burden may be excessive if requirements are unclear.</p> <p><b>Suggested change:</b> Revise the paragraph to clearly state the individual requirements.</p>	<p>Intent has been addressed; the text has been revised by splitting the paragraph into two separate paragraphs.</p>

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70	OPG, NB Power, Bruce Power	Section 4.2.5 p. 18 Second paragraph	<p><b>Industry Issue:</b> The requirement to comply with CNSC EG1 and EG2 may be difficult or impossible for a non-CANDU NPP licensee.</p> <p>Cost and burden to a non-CANDU NPP may be excessive, if required to meet the current CANDU requirements. Detailed lists and processes do not belong in the REGDOC that describe the certification examination requirements.</p> <p><b>Suggested change:</b> Modify the document to clearly identify the minimum examination requirements for positions requiring examination.</p> <p>Revise CNSC-EG1 and EG2 so that they are applicable to all types of NPPS. Rewrite these [those] documents to be much higher level documents.</p>	<p>Text has been revised for clarification, and to change the “should” to “shall”. EG-1 and EG-2 are currently, and will remain, certification examination methodology requirements for existing NPPs, and will form the basis for applicants for new NPPs to develop methodologies jointly with the CNSC’s Personnel Certification Division (PCD). For new NPPs, compliance with EG-1 and EG-2 will be evaluated on a case-by-case basis, in a risk-informed, graded approach.</p> <p>EG-1 and EG-2 are currently being merged into one document and will be published as a REGDOC. The CNSC will always require assurances of qualifications of personnel in order to approve certification. The certification examination requirements will continue to include a series of written and simulator testing methodologies that provide the CNSC with assurances that workers who have a direct impact on safety have acquired the level of knowledge, skills and attributes required to respond to all operating conditions of the NPP whether during normal, abnormal or emergency operating conditions (such as design basis or beyond-design-basis accidents).</p>
71	OPG, NB Power, Bruce Power	4.2.5 Reference to EG1, EG2	<p><b>Industry Issue:</b> These documents are in to the process of being superseded by a new REGDOC.</p> <p><b>Suggested change:</b> Update reference</p>	<p>No change at the current time. All references to other regulatory documents are updated whenever the regdoc is revised or reaffirmed. In this case, the references to EG1 and EG2 will stay “as is” unless REGDOC-2.2.3 is published ahead of REGDOC-1.1.3.</p>

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72	OPG, NB Power, Bruce Power	Section 4.2.5 p. 18 Second paragraph  <b>MAJOR</b>	<p><b>Industry Issue:</b> The document: “<i>Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants, Revision 2,</i>” is not applicable to the conduct of initial certification examinations.</p> <p><b>Suggested change:</b> Delete: “<i>Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants, Revision 2</i>” from this paragraph.</p> <p><b>Impact on Industry:</b> It is not appropriate to require determination of how to apply current requalification testing requirements to the development and conduct of initial examinations.</p>	Text has been clarified. New applicants need to know requalification requirements and build that into their programs
73	OPG, NB Power, Bruce Power	Section 4.2.7 p. 18 First paragraph  <b>MAJOR</b>	<p><b>Industry Issue:</b> RD-204 is currently only applied to workers whose positions require certification.</p> <p><b>Suggested change:</b> Revise wording to:</p> <p>“For positions requiring certification, the application shall describe how the requirements for fitness for duty will be implemented in accordance with <i>RD-204, Certification of Persons Working at Nuclear Power Plants.</i>”</p> <p>Consider referring to REGDOC 2.2.4 –Fitness for duty</p> <p><b>Impact on Industry:</b> Cost and burden may be excessive if required to meet the current RD-204 requirements for all workers.</p>	Text revised to address the intent of the comment. The word “all” has been removed. The sentence is clear that requirements for fitness for duty are in accordance with RD-204, which details <i>which</i> workers must be certified.

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74	OPG, NB Power, Bruce Power	4.3.1 Page 19	<p><b>Industry Issue:</b> The first bullet is confusing when it says normal plant operations, 'are carried out safely, such that radiation doses to workers and members of the public – as well as any planned discharges or releases of radioactive material or hazardous substances from the plant – will be within the authorized limits specified in the <i>General Nuclear Safety and Control Regulations</i>, the <i>Class I Nuclear Facilities Regulations</i> and the <i>Radiation Protection Regulations</i>'.</p> <p>There are no limits that apply to NPPs in the General Nuclear Safety and Control Regulations or the Class I Nuclear Facilities Regulations.</p> <p><b>Suggested change:</b> Reword to eliminate the impression that limits that apply to NPPs are contained in the <i>General Nuclear Safety and Control Regulations</i> or the <i>Class I Nuclear Facilities Regulations</i></p>	<p>Text has been revised to remove the regulations. Text now states:</p> <p>The application shall include information on how the applicant will ensure that normal plant operations:</p> <ul style="list-style-type: none"> <li>are carried out safely, such that radiation doses to workers and members of the public – as well as any planned discharges or releases of radioactive material or hazardous substances from the plant – will be within <del>the</del> authorized limits <del>specified in the <i>General Nuclear Safety and Control Regulations</i>, the <i>Class I Nuclear Facilities Regulations</i> and the <i>Radiation Protection Regulations</i></del></li> </ul>
75	OPG, NB Power, Bruce Power	4.3.1 Paragraph 1	<p><b>Industry Issue:</b> "... adhere to the requirements in the regulations listed above, in REGDOC-2.9.1, Environmental Protection: Environmental Policy, Assessments and Protection Measures [9], and in any provincial legislation or other applicable codes and standards."</p> <p>This statement is very vague and broad.</p> <p><b>Suggested change:</b> Suggest changing to:</p> <p>"... any <del>applicable</del> provincial legislation or other applicable codes and standards."</p>	Text has been revised as suggested.

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76	OPG, NB Power, Bruce Power	4.3.1 Paragraph 2	<p><b>Industry Issue:</b> “The application should describe how the SSCs will be operated in accordance with approved operating procedures ...”</p> <p>This is not clear. This is another example where using the actual words from the regulations would be more appropriate than attempting to interpret or paraphrase.</p> <p><b>Suggested change:</b> It would be more clear to state that the application should describe the conduct of operations process including the approved operating procedures ...</p>	<p>Text has been revised to use the wording from paragraph 6(d) of the <i>Class I Nuclear Facilities Regulations</i>:  <b>(d)</b> the proposed measures, policies, methods and procedures for operating and maintaining the nuclear facility;                  Also, because the wording comes from the <i>Class I Nuclear Facilities Regulations</i>, “should” has been changed to “shall”.</p>
77	OPG, NB Power, Bruce Power	4.3.2 Page 20  <b>MAJOR</b>	<p><b>Industry Issue:</b> Unclear what is meant by the statement:                  “The application should include details of the validation and implementation of all normal, abnormal, unplanned and emergency operating procedures.”</p> <p><b>Suggested change:</b> Reference should be made to the process for validation and implementation rather than requesting the actual validation and implementation.</p> <p><b>Impact on Industry:</b> This could result in an excessively large application if the CNSC is looking for the actual validation documentation for all normal, abnormal, unplanned and emergency operating procedures. There will also be significant additional contention and work for the licensee, as CNSC HOPD staff consistently want more rigorous (and, in the licensees’ view, unnecessary) validations and verifications conducted</p>	<p>Text has been revised as follows:                  The application should <b>describe how</b> all normal, abnormal, unplanned and emergency operating procedures <b>will be validated</b>.</p> <p>CNSC staff will verify application of the validation process during the review of the licence application. Note that, as necessary, there will be verification of the operating procedures validation.</p>
78	OPG, NB Power	4.3.2 Paragraph 1	<p><b>Industry Issue:</b> This paragraph repeats much of what has already been stated in earlier sections of the document.</p> <p><b>Suggested change:</b> Suggest deleting paragraph to avoid repetition in the document.</p>	<p>Some of the text in the first sentence has been deleted. Note that the text is specific to procedures under operating procedure.</p>

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79	OPG, NB Power, Bruce Power	4.3.3 Page 20	<p><b>Industry Issue:</b> If this is intended to be technology neutral, the wording in the third paragraph should be changed.</p> <p><b>Suggested change:</b> Suggest technology neutral wording to state [say]:</p> <p>“The information submitted should describe how the applicant will comply with limits imposed by the design and safety analysis assumptions – <i>specifically for example</i>, the total power generated in any one fuel bundle, the total power generated in any fuel channel, and the total thermal power from the reactor fuel.”</p>	Text has been revised as suggested.
80	OPG, NB Power, Bruce Power	4.3.3 Page 20, 2nd paragraph	<p><b>Industry Issue:</b> SOE conditions are not necessarily associated with limits.</p> <p><b>Suggested change:</b> Reword to say:                      “The application should state the safe operating limits <b>and conditions ...</b>”</p>	Text has been revised as suggested.
81	OPG, NB Power, Bruce Power	Section 4.3.3 p. 20 Third paragraph	<p><b>Industry Issue:</b> Text is unclear: “The information submitted should be sufficient to demonstrate that the set of limits and conditions and the accompanying design information for the plant will be used to establish and carry out the training, qualification and certification of plant personnel.”</p> <p>Is the requirement that an input to the SAT-based training is the definition/documentation of the safe operating envelope?</p> <p><b>Suggested change:</b> Revise the document to clearly define the requirement being addressed.</p>	Text has been clarified to address the intent of the comment.
82	OPG, NB Power, Bruce Power	4.3.3 Paragraph 5	<p><b>Industry Issue:</b> “If a currently-licensed facility is transitioning to a safe operating envelope (SOE) program from ...”</p> <p>All Canadian nuclear facilities are compliant with CSA N290.15</p> <p><b>Suggested change:</b> Delete this paragraph.</p>	Text has been deleted.

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83	OPG, NB Power, Bruce Power	4.3.3 Page 20, final paragraph	<p><b>Industry Issue:</b> This paragraph does not apply to the safe operating envelope section since minimum shift composition and hours of work are not defined by the SOE per definition of CSA N290.15. This standard makes no reference to minimum shift composition or hours of work. This appears to be due to the inclusion of a discussion of transition from the OP&amp;Ps to SOE. However, those aspects are not part of SOE but are addressed by other programs. It is inconsistent with the definition of Safe Operating Envelope in CSA N290.15</p> <p><b>Suggested change:</b> Suggest removing this paragraph from the safe operating envelope section or moving it to section 4.2 (Human Performance Management).</p>	Text has been removed.
84	OPG, NB Power, Bruce Power	4.3.4 Paragraph 1	<p><b>Industry Issue:</b> "... periodic shutdowns ..." Is this referring to planned maintenance outages?</p> <p><b>Suggested change:</b> Clarify the reference.</p>	Text has been modified to replace "periodic shutdowns of the reactor" with "maintenance outages".



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85	OPG, Bruce Power, NB Power	4.3.4 Page 21  <b>MAJOR</b>	<p><b>Industry Issue:</b> The second paragraph and associated bullets seeking outage schedules is unreasonable and far too detailed, especially given 10-year licensing periods. For licence renewals, planned safety-related upgrades would be covered by the PSR IIP. REGDOC-3.1.1 already requires the submission of a variety of outage related reports. This doesn't need to be in this guide.</p> <p>The third paragraph, which says, "The outage management program should include provisions to ensure that, following the restart of the reactor, an outage completion assurance statement is submitted to ..." is already a requirement in REGDOC-3.1.1.</p> <p><b>Suggested change:</b> Delete the second paragraph and its associated bullets, or qualify the request such that it is a high-level plan since too much detail is requested.</p> <p>Delete paragraph three</p> <p><b>Impact on Industry:</b> Seeking outage schedules is not a practical request and is totally unnecessary for the application of the licence. A licensee would not be able to provide this in any detail, [especially for multi-unit sites (up to eight units covered by the licence application)]</p>	<p>Text has been revised as follows:</p> <ul style="list-style-type: none"> <li>- Deleted paragraph 2 and related bullet points.</li> <li>- Paragraph 3 has been revised and the following reference has been added:</li> </ul> <p>For more information on specific reporting requirements for outages, refer to REGDOC-3.1.1, <i>Reporting Requirements for Nuclear Power Plants, version 2</i> [9].</p>

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86	OPG, NB Power, Bruce Power	4.3.5 Pages 21 & 22  <b>MAJOR</b>	<p><b>Industry Issue:</b> The use of REGDOC-2.3.2, <i>Accident Management, version 2</i> should be removed from the guide. The version of the REGDOC inappropriately groups design basis events with severe accidents. These two distinct entities are handled much differently and should not have combined requirements. Currently, licensees do not have their programs set up this way and it is wrong to do so.</p> <p>The first paragraph on page 22 describes program requirements and not the application. It is inconsistent with the current SAM symptom-based approach: ‘The description of the measures in place for accident and severe accident management should demonstrate that the following have been taken into account in the development of the EOPs and SAM guidelines (including timelines and milestones):                      -results of all accident analyses...’                      -</p> <p><b>Suggested change:</b> Delete the requirement to use REGDOC-2.3.2, <i>Accident Management, version 2</i>, since there are several REGDOCs on accident management. Further, the CNSC should convene an industry workshop to address outstanding issues with this version of REGDOC-2.3.2.</p> <p><b>Impact on Industry:</b> REGDOC-2.3.2, <i>Accident Management, version 2</i> is not implementable as written. There is no path to compliance with this document and industry suggests a workshop is required to address this issue.</p>	<p>For REGDOC-2.3.2 version 2: no change; see response to comment #9.</p> <p>For remainder of comment: text has been revised as follows:</p> <ul style="list-style-type: none"> <li>- minor edits for consistency in wording</li> <li>- to add the following text:                             <p style="margin-left: 40px;">“The application should describe the systematic approach. <del>The description of the measures in place for accident and severe accident management should demonstrate that the following have been taken into account in the development of</del> <b>and the principles and data used</b> to develop the EOPs and SAM guidelines.”</p> </li> <li>- and to remove the detailed list of inputs (7 bullet points)</li> </ul>
87	OPG, NB Power, Bruce Power	Section 4.3.5 p. 22 First set of bullets, seventh bullet	<p><b>Industry Issue:</b> The requirement to develop operating procedures based on the approach to training of those procedures does not align with current practices, where the training approach is based on the procedures as they are written.</p> <p><b>Suggested change:</b> Revise the document to clearly define the requirement being addressed.</p>	Text has been removed based on comment #86.

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88	OPG, NB Power, Bruce Power	4.3.5 Page 22, final paragraph	<p><b>Industry Issue:</b> The statement duplicates information in section 4.10.2 and should be deleted from this section</p> <p><b>Suggested change:</b> Delete the following sentence:</p> <p><del>‘The application should describe any natural event or event caused by human actions within and beyond the design basis that would affect emergency management requirements, such as forest fires, earthquakes, extreme weather conditions, toxic fume clouds, explosions and airplane crashes.’</del></p>	Text has been deleted as suggested.
89	OPG, NB Power, Bruce Power	4.4 Page 23  <b>MAJOR</b>	<p><b>Industry Issue:</b> This guidance appears to move beyond current practice. Licensing renewal analyses currently and effectively focus on the limiting safety analyses addressing aging impacts, design changes, or operational practice changes which may impact safety margins.</p> <p>This is another comment supporting the need to distinguish between new applications and license renewals.</p> <p><b>Suggested change:</b> Section 1.2 “Scope” allows “mapping” from previous submission, the “mapping” should be defined more clearly, e.g. if reference is adequate or re-writing &amp; packaging the previous information is needed.</p> <p><b>Impact on Industry:</b> This guidance seems to require a much more comprehensive and larger scope of analyses and assessments, in addition to the Periodic Safety Review, which could impose a significant resource burden on licensees with no corresponding increase in safety.</p>	As stated in the response to comment #11, this licence application guide specifies that the application may reference any documentation that was submitted for previous licence applications.

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90	OPG, NB Power, Bruce Power	4.4 and 4.4.1 Page 23  <b>MAJOR</b>	<p><b>Industry Issue:</b> The guide doesn't need to provide a description of each SCA. Both of these sections state what the objective of safety analysis is supposed to be but they are different.</p> <p>This guide should avoid repeating similar concepts that are stated differently.</p> <p><b>Suggested change:</b> Delete the first paragraph under section 4.</p>	<p>Text in section 4.4.1 has been revised as follows:</p> <ul style="list-style-type: none"> <li>- “consist of” changed to “include”</li> <li>- second sentence in the first paragraph has been revised for clarity</li> </ul> <p>Note that the first paragraph is the definition of the safety analysis <u>SCA</u> and is provided for context and clarity for new applicants; the other paragraph describes what should be included in the safety analysis itself.</p>
91	OPG, NB Power, Bruce Power	4.4.2 Page 23	<p>It is stated that the postulated initiating events shall meet the requirements of REGDOC-2.5.2, which is for design of new nuclear plants. This supports the need to distinguish between new applications and license renewals.</p> <p><b>Suggested change:</b> Remove reference to REGDOC-2.5.2</p> <p><b>Impact on Industry:</b> Precedent setting: As currently written, this would require existing plants to meet new build requirements, whereas this should be done on a case-by-case best effort basis.</p>	<p>Reference to REGDOC-2.5.2 has been removed. For the purposes of this section, the reference to REGDOC-2.4.1 is sufficient.</p>
92	OPG, NB Power, Bruce Power	4.4.3 Page 23 (bottom of page) NSAS	<p><b>Industry Issue:</b> The reference to dose limits is too specific and redundant to the surrounding paragraphs.</p> <p>Also, the dose limits are prescribed by the RPRs and the Siting guide. They don't need to be re-stated in the application.</p> <p>Not clear that is meant by dose limits.</p> <p><b>Suggested change:</b> Modify the final line to state:</p> <p>“The application should describe the trip coverage and trip set points,”</p> <p>or please provide more clarity on what is required on dose limits.</p>	<p>Reference to “dose limits” has been revised to “dose acceptance criteria”.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>- the <i>Radiation Protection Regulations</i> do not specify the dose limits to the public under accident conditions.</li> <li>- The Siting Guide is only applicable to the Bruce Power, OPG Pickering and Point Lepreau stations.</li> <li>- C6 applies to the OPG Darlington station.</li> <li>- The dose limits in REGDOC-2.5.2 apply to new reactor facilities.</li> </ul>

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93	OPG, NB Power, Bruce Power	4.4.3 Page 24 (top of page)	<p><b>Industry Issue:</b> Normally, safety analysis does not consider the details specified in the first bullet, i.e.</p> <p>“normal plant operations can be carried out safely such that radiation doses to workers and members of the public, and any planned discharges or releases of radioactive material from the plant will be within authorized limits.”</p> <p>This part should not be under Deterministic Safety Analysis. These are part of the design of the plant.</p> <p><b>Suggested change:</b> Either remove this paragraph and its associated bullets or move them under design section.</p> <p>We also suggest reworking the second bullet slightly to state [say]:</p> <p>“<b>Applicable dose limits</b> <del>doses</del> under design-basis accidents (DBAs) are met,”</p> <p>since dose limits under DBA can be different depending on SF or DF.</p>	<p>Text has been revised to incorporate the intent of the comment. Two bullet points have been revised as follows:</p> <ul style="list-style-type: none"> <li>-“normal plant operations...within authorized limits” has been moved to section 4.5.1</li> <li>-changed “doses” to “applicable dose limits”</li> </ul> <p>And further, the following paragraph has been added to section 4.5.1 (Physical design, general considerations):</p> <p>“In addition, the application should demonstrate that the dose acceptance criteria and safety goals are met.”</p>
94	OPG, NB Power, Bruce Power	4.4 Page 24  <b>MAJOR</b>	<p>It is stated that the hazards analysis shall meet requirements of REGDOC-2.5.2, which is for design of new nuclear plants.</p> <p><b>Suggested change:</b> Remove reference to REGDOC-2.5.2</p> <p><b>Impact on Industry:</b> Precedent setting: As currently written, this would require existing plants to meet new build requirements, whereas this should be done on a case-by-case best effort basis.</p>	<p>Reference to REGDOC-2.5.2 has been removed. The hazard analysis is to be addressed via REGDOCs 2.4.1 and 2.4.2.</p>

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95	OPG, NB Power, Bruce Power	4.4.4 paragraph 2  <b>MAJOR</b>	<p><b>Industry Issue:</b> “This analysis should include all potential hazards (internal and external), both natural and human induced.”</p> <p>This statement is too broad.</p> <p><b>Suggested change:</b> Delete paragraph 2</p> <p><b>Impact on Industry:</b> This statement is too broad. Reference to REGDOC-2.4.2 should be sufficient to define the scope of what the analysis has to consider.</p>	Text has been deleted as suggested.
96	OPG, NB Power, Bruce Power	4.4.5 and 4.4.6 and others  <b>MAJOR</b>	<p><b>Industry Issue:</b> These sections include descriptions of what a PSA is, what BDBA are and how the analysis should be done. This information is not appropriate in this guide and is already covered by existing regulatory documents.</p> <p><b>Suggested change:</b> Delete these descriptions/discussions.</p> <p><b>Impact on Industry:</b> Reference to an existing REGDOC is sufficient for the purpose of this guide. For example, the statement, “The applicant shall demonstrate that a severe accident analysis has been performed in accordance with the requirements of:                      - REGDOC-2.3.2, Accident Management version 2 [10]                      - REGDOC-2.4.1, Deterministic Safety Analysis [11]                      - REGDOC-2.4.2, Probabilistic Safety Assessment (PSA) for Nuclear Power Plants [13]” is sufficient for the purpose of the guide.</p>	<p>Most text has been retained, but paragraphs have been removed from sections 4.4.5 and 4.4.6, and other edits have been made to improve clarity.</p> <p>Descriptions are intended to provide context and emphasis.</p>

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97	OPG, NB Power, Bruce Power	4.4.6 Page 25  <b>MAJOR</b>	<p><b>Industry Issue:</b> The use of REGDOC-2.3.2, <i>Accident Management</i>, version 2 should be removed from the guide. The version of the REGDOC inappropriately groups design basis events with severe accidents. These two distinct entities are handled much differently and should not have combined requirements. Currently licensees do not have their programs set up this way and it wrong to do so.</p> <p><b>Suggested change:</b> Delete the requirement to use version 2.</p> <p><b>Impact on Industry:</b> REGDOC-2.3.2, <i>Accident Management</i>, version 2 is not implementable as written. There is no path to compliance with this document</p>	No change; see response to comment #9.
98	OPG, NB Power, Bruce Power	4.4.8 Page 26  <b>MAJOR</b>	<p><b>Industry Issue:</b> The use of REGDOC-2.3.2, <i>Accident Management</i>, version 2 should be removed from the guide. The version of the REGDOC inappropriately groups design basis events with severe accidents. These two distinct entities are handled much differently and should not have combined requirements. Currently licensees do not have their programs set up this way and it wrong to do so.</p> <p><b>Suggested change:</b> Delete the requirement to use version 2.</p> <p><b>Impact on Industry:</b> REGDOC-2.3.2, <i>Accident Management</i>, version 2 is not implementable as written. There is no path to compliance with this document</p>	

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99	OPG, NB Power, Bruce Power	4.5 Description of SSCs	<p><b>Industry Issue:</b> “For each SSC, the application should describe in detail the characteristics, major components and design basis requirements ....”</p> <p>This may be applicable to a new license but not a renewal for an existing facility.</p> <p><b>Suggested change:</b> Confirm this information is really required. Similar concerns with sections following.</p>	<p>No change. This information is needed to provide clarity on the licensing basis for the following reasons:</p> <ul style="list-style-type: none"> <li>- to support safety analyses</li> <li>- to confirm SOE is set appropriately</li> <li>--to support operating documentation</li> <li>- to support assessment of engineering changes</li> <li>- to confirm aspects such as equipment qualification, reliability, aging and so on</li> <li>- to support system inspections</li> <li>- to support training, qualification and certification of plant staff</li> <li>- mandatory for CNSC staff's assessment of design changes</li> </ul> <p>Licensees can make reference to their documentation to address this section,</p> <p>This list, with a few additions, was taken directly from clauses 3.65 and 3.66 of the IAEA's GS-G-4.1, “Format and Content of the Safety Analysis Report” and addresses the following paragraphs from section 6 of the <i>Class I Nuclear Facilities Regulations</i>:</p> <ul style="list-style-type: none"> <li>(a) a description of the structures at the nuclear facility, including their design and their design operating conditions;</li> <li>(b) a description of the systems and equipment at the nuclear facility, including their design and their design operating conditions;</li> <li>(c) a final safety analysis report demonstrating the adequacy of the design of the nuclear facility;</li> </ul>



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100	OPG, NB Power, Bruce Power	4.5.17 Class II facilities and laboratories  <b>MAJOR</b>	<p><b>Industry Issue:</b> If these facilities are separately licensed, detailed information should not be required, as these would not be included as licensed activities for the application</p> <p><b>Suggested change:</b> Revise wording such that information is required only if included as licensed activities under the Class I licence.</p> <p><b>Impact on Industry:</b> These facilities already have a rigorous licensing process, including payment of fees. This could result in double licensing of these facilities, where they are not part of the Class I licensed activities.</p>	<p>Text has been revised as follows:</p> <p>The applicant should provide information on the design of laboratories and Class II nuclear facilities within the NPP <b>and if included as a licensed activity under the Class I licence.</b></p>
101	OPG, NB Power, Bruce Power	4.6 Page 47  <b>MAJOR</b>	<p><b>Industry Issue:</b> There are a lot of requirements specified in this document which licensees are in compliance with under fitness for service programs. It is not clear with the additional requirement in terms of level of details needed and associated CNSC approval, e.g. if the references to current LCMP and active dispositions is sufficient.</p> <p><b>Suggested change:</b> Suggest adding statements to clarify that it is sufficient for applicants to reference current documents the CNSC has reviewed and approved. These could include PIP documents, possibly the LCMP and the active dispositions for fuel channels, feeders and standby generators.</p> <p><b>Impact on Industry:</b> This document appears to be seeking information licensees already possess and descriptions of activities we already conduct. Most fitness for service work has been submitted and reviewed by CNSC.</p> <p>If additional requirement cannot be met by simply referencing the existing LCMP and active dispositions, significant effort would be required for re-licensing submissions and obtaining CNSC approval.</p>	<p>As stated in the response to comment #11, this licence application guide specifies that the application may reference any documentation that was submitted for previous licence applications.</p>

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102	OPG, NB Power, Bruce Power	4.6.1 Page 47	<p><b>Industry Issue:</b> Lack of clarity. As a literal interpretation, the statement as currently written would require the application to list hundreds of thousands of components.</p> <p><b>Suggested change:</b> Rewrite to state [say]:</p> <p>“The application should identify <del>all</del> <b>SSCs</b> the licensee’s process for designating which SSCs are important to safety (as described in REGDOC-2.5.2, <i>Design of Reactor Facilities: Nuclear Power Plants</i> [12]) in the licence application.”</p>	No change to the intent of the text; however, the reference to REGDOC-2.5.2 has been removed. Note that the CNSC does expect the applicant to identify all SSCs important to safety; however, the applicant may provide a reference to any document that was submitted as part of a previous licence application.
103	OPG, NB Power, Bruce Power	4.6.2 Page 47	<p><b>Industry Issue:</b> The word <b>always</b> imposes an impossible requirement. as a particular component would never be allowed to fail. Requirement should be to perform in accordance with specifications and overall reliability requirements</p> <p><b>Suggested change:</b> Rewrite to state [say]:</p> <p>“Reliability programs establish processes to demonstrate that SSCs are <del>always</del> capable of performing their design function in accordance with predefined specifications.”</p>	Paragraph has been deleted (see comment 104). If the paragraph had not been deleted, the text would have been revised as suggested.

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104	OPG, NB Power, Bruce Power	4.6.2 Page 47  <b>MAJOR</b>	<p><b>Industry Issue:</b> Current wording is too specific and not consistent with references in RD/GD 98.</p> <p><b>Suggested change:</b> Suggest that reference be made to RD/GD 98 and NOT specify the wording from RD/GD 98</p> <p><b>Impact on Industry:</b> The original wording is very specific. Licensees are not sure why these examples are specifically proposed for inclusion as elements? Original wording not consistent with reference RD/GD 98.</p>	<p>Text has been revised as follows for clarity:</p> <p><b>For new facilities, the reliability program shall meet the requirements of REGDOC-2.5.2, Design of Reactor Facilities: Nuclear Power Plants [12].</b></p> <p><b>For currently-licensed facilities applying for a licence renewal,</b> the reliability program shall meet the requirements of RD/GD-98, <i>Reliability Programs for Nuclear Power Plants</i>. [15]</p> <p>The application should <b>provide a description</b> of the reliability program for plant systems whose failure affects the risk of a release of radioactive or hazardous material. <b>Some examples of topics include:</b></p>
105	OPG, NB Power, Bruce Power	4.6.3 Page 47 Last paragraph	<p><b>Industry Issue:</b> The purpose of the maintenance program is not to prevent future degradation, as stated in this sentence.</p> <p><b>Suggested change:</b> Rewrite to state [say]:</p> <p>“The maintenance program should include processes for planning, monitoring, scheduling and executing work activities that ensure SCCs continue to <del>meet design specifications, prevent future degradation, or correction of current failure and impairments</del> perform the design intent and remain fit for service in the presence of degradation mechanisms.”</p>	Text has been revised as suggested.
106	OPG, NB Power, Bruce Power	4.6.4 Page 48	<p><b>Industry Issue:</b> Improper requirement for fourth bullet under aging management program section Requirements should be on having a process, similar to other bullets in this Section</p> <p><b>Suggested change:</b> Rewrite to state [say] [Amend bullet to say]:</p> <p>“evaluation <b>process</b> for aging management “</p>	No change. The list in section 4.6.4 of REGDOC-1.1.3 is consistent with section 4 of REGDOC-2.6.3.

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107	OPG, NB Power, Bruce Power	4.6.4 Page 48	<p><b>Industry Issue:</b> Lack of clarity with ninth bullet under aging management programs. Without the inclusion of the words SSC-specific, it's unclear what is meant</p> <p><b>Suggested change:</b> Rewrite to state [say] [Amend bullet to say]:</p> <p>“implementation of <b>SSC-specific</b> aging management programs”</p>	Text has been revised as suggested.
108	OPG, NB Power, Bruce Power	4.6.4 Page 49, top of page	<p><b>Industry Issue:</b> Suggest removing the more extreme or limiting words ‘minimize’ and ‘necessary’ from third sentence. As currently written, could result in unnecessarily onerous requirements – the main focus should be on understanding and controlling, with flexibility on degree of prevention as long as licensee remains within specifications</p> <p><b>Suggested change:</b> Revise to state [Amend to read]:</p> <p>“...and any preventive actions <b>necessary to minimize and</b> control ageing degradation of the SSCs.”</p>	The word “necessary” has been removed.
109	OPG, NB Power, Bruce Power	4.6.5 Page 49	<p><b>Industry Issue:</b> Suggest removing words like <b>minimize</b> and <b>minimization</b> from bullets under chemistry control program. As above, reword to remove the words minimize and minimization</p> <p><b>Suggested change:</b> Revise [Amend] bullets to read:</p> <ul style="list-style-type: none"> <li>• <b>manage minimize</b> the harmful effects of chemical impurities and corrosion on plant SSCs</li> </ul> <p>support the <b>minimization ALARA principle to manage</b> the buildup of radioactive material and occupational radiation exposure</p>	<p>Text has been revised as follows:</p> <p>The application should include a clearly defined chemistry control program that states the goals and objectives of the program. The program should:</p> <ul style="list-style-type: none"> <li>• preserve the integrity of SSCs important to safety</li> <li>• <b>minimize manage</b> the harmful effects of chemical impurities and corrosion on plant SSCs</li> <li>• <del>support the minimization of</del> <b>implement the ALARA principle to manage the</b> buildup of radioactive material and occupational radiation exposure</li> <li>• limit the release of chemicals and radioactive material to the environment</li> </ul>

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110	OPG, NB Power, Bruce Power	4.6.5 Page 49	<p><b>Industry Issue:</b> Clarify the sixth paragraph under chemistry control program</p> <p><b>Suggested change:</b> Revise [Amend] bullets to read:</p> <p>“The applicant should <del>include</del> describe provisions for a post-accident sampling system or other adequate sampling facility.”</p>	Text has been revised as suggested.
111	OPG, NB Power, Bruce Power	4.6.6 Page 50	<p><b>Industry Issue:</b> Clarify bullet 5 by adding <b>nuclear</b> to modify safety. Clarification requested on definition of ‘safety’ being applied here, i.e. is it reactor safety, as opposed to industrial safety?</p> <p><b>Suggested change:</b> Revise [Amend] bullets to read:</p> <p>“balance-of-plant pressure boundary components important to <b>nuclear</b> safety”</p>	<p>No change to the phrase “important to safety”; it is a standard industry phrase.</p> <p>The bullet point about “balance-of-plant pressure boundary...” has been revised as suggested.</p>
112	OPG, NB Power, Bruce Power	4.7.3 Page 53  <b>MAJOR</b>	<p><b>Industry Issue:</b> “The applicant should provide the quantity of each type of instrument.”</p> <p>This level of detail is not required to demonstrate that the licensee will provide sufficient quantities and types of radiation protection equipment for anticipated needs in normal operations and emergencies.</p> <p><b>Suggested change:</b> Remove first sentence in paragraph.</p> <p>Could add that:</p> <p>“The applicant should describe how their program will provide adequate quantities and types of equipment.”</p> <p><b>Impact on Industry:</b> This is an onerous task to estimate, and the quantity of equipment would change over the licensing period. Regulatory burden ensuring quantities of instruments in the field, maintenance, calibration and stores meet the committed number of instruments stated in the application.</p>	Text has been revised as suggested (removed “The applicant should provide the quantity of each type of instrument” and added “The applicant should describe how their program will provide adequate quantities and types of equipment.”).

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113	OPG, Bruce Power	4.8 Page 55  <b>MAJOR</b>	<p><b>Industry Issue:</b> The existing Ontario NPPs are not subject to the Canada Labour Code Part II.</p> <p><b>Suggested change:</b> Add a statement on the Ontario Occupational Health and Safety Act. Suggested wording:</p> <p>“It also addresses the requirements of the <i>Canada Labour Code Part II</i> or the <i>Ontario Occupational Health and Safety Act</i> for existing Ontario NPPs.”</p> <p><b>Impact on Industry:</b> Existing Ontario NPPs will need to demonstrate compliance with the Ontario OSHA, not the CLC. It is also anticipated that new NPPs in Ontario would also end up exempt from the CLC.</p>	Text has been revised as suggested (using “provincial”).
	NB Power	<p><b>Industry Issue:</b> The existing NPPs are not subject to the Canada Labour Code Part II.</p> <p><b>Suggested change:</b> Add a statement on the New Brunswick / Ontario Occupational Health and Safety Act. Suggested wording:</p> <p>“It also addresses the requirements of the <i>Canada Labour Code Part II</i> or the <i>provincial Occupational Health and Safety Act</i> for existing NPPs.”</p> <p><b>Impact on Industry:</b> Existing NPPs will need to demonstrate compliance with the OSHA, not the CLC. It is also anticipated that new NPPs in would also end up exempt from the CLC.</p>		

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	Reviewer	Section or Para. #	Reviewer's Comment and Proposed Change	Response
114	OPG, NB Power, Bruce Power	4.9.1 Page 56	<p><b>Industry Issue:</b> States that the application should provide “a list of all SSCs that are important for preventive and control measures” for environmental protection from plant discharges.</p> <p>Is the intent to provide a list of SSCs relevant to, for example, Active Liquid Waste and stack monitoring, or Steam Generator tube leak prevention and monitoring? This statement could be interpreted too broadly.</p> <p><b>Suggested change:</b> Need to clarify scope. As written, the statement could be interpreted as all process system components that maintain the pressure boundary.</p>	Text has been revised to remove “all” and to add “for example, active liquid waste and stack monitoring equipment”.
115	OPG, NB Power, Bruce Power	4.9.1 Page 56  <b>MAJOR</b>	<p><b>Industry Issue:</b> BATEA should be a consideration in REGDOC-2.5.2 only and deleted here.</p> <p><b>Suggested change:</b> Need to distinguish between a new license application and a renewal for an existing application</p> <p><b>Impact on Industry:</b> Existing facilities cannot be redesigned and must operate within the existing design</p>	<p>Text has been revised to refer to REGDOC-2.9.1, <i>Environmental Protection: Environmental Principles, Assessments and Protection Measures</i> (published Dec. 2016).</p> <p>The concept of BATEA is not new and is described in REGDOC-2.9.1. CNSC has been applying the concepts of BATEA for new facilities and existing facilities where additional treatment has been required. See REGDOC-2.9.1, <i>Environmental Principles, Assessments and Protection Measures</i> for additional information.</p>
116	OPG	4.10 4.11	<p><b>Industry Issue:</b> This document should not specifically refer to clauses of the Class 1 Regulations specific to Decommissioning licences, as this causes confusion and may establish new regulatory requirements outside the scope of guidance. Examples:</p> <ul style="list-style-type: none"> <li>-Reference to Class I Regulations, section 7i, should not be needed in 4.10 because 6k covers the same topics.</li> <li>-7f and 7k should not be needed in 4.11 because 3k covers decommissioning plans.</li> </ul> <p><b>Suggested change:</b> Remove inappropriate clauses.</p>	Throughout REGDOC-1.1.3, references to paragraphs 7(i), (f) and (k) of the <i>Class I Nuclear Facilities Regulations</i> have been removed.

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	NB Power, Bruce Power	4.10 and 4.11 Page 61 and 63  <b>MAJOR</b>	<p><b>Industry Issue:</b></p> <ul style="list-style-type: none"> <li>- Class I Nuclear Facilities Regulations, paragraphs 3(f), 6(k) and 7(i)</li> <li>- Class I Nuclear Facilities Regulations, paragraphs 3(f) and (k), 4(e), 6(h), (i) and (j), and 7(f) and (k)</li> </ul> <p>Clauses 7(i), 7(f) and 7{k} should not be included in this document since they are for a licence to decommission.</p> <p><b>Suggested change:</b> Delete reference to items 7(i), 7(f) and 7(k).</p> <p><b>Impact on Industry:</b> This document should not [specifically] refer to clauses of the Class 1 Regs specific to Decommissioning licences as this causes confusion and may establish new regulatory requirements outside the scope of guidance.</p>	
117	OPG, NB Power, Bruce Power	4.10.1 Page 61  <b>MAJOR</b>	<p><b>Industry Issue:</b> There is no requirement in the regulations for the submission of a pandemic plan. This is also addressed in comments on 4.1.9</p> <p><b>Suggested change:</b> Delete:  <del>“The application should include a pandemic plan that contains proactive measures to prevent the spread of disease and to mitigate the effects of widespread absenteeism that could occur during the height of a pandemic outbreak.”</del></p> <p><b>Impact on Industry:</b> This requirement goes beyond the requirements of the regulations. The Licence Application Guide should not be setting requirements.</p>	<p>Text has been revised (the paragraph has been deleted), based on the fact that contingency provisions for pandemics and for possible labour disruptions are requested in section 4.1.9, Business continuity.</p> <p>Note that in cases where a request for information does not exist in any other regulatory document or standard, it will be contained in this regulatory document.</p> <p>See also response to comment # 62.</p>



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118	OPG, NB Power, Bruce Power	4.10.4 Page 62  <b>MAJOR</b>	<p><b>Industry Issue:</b> The note regarding the third party audit of the fire brigade should not be included in a licence application guide. It should be embedded in the CSA Standard or through a licence condition.</p> <p><b>Suggested change:</b> Delete:  <del>'The program should include provisions for a third party audit of the industrial fire brigade once every two years.'</del></p> <p><b>Impact on Industry:</b> The Licence Application Guide should not be setting requirements.</p>	Text has been removed as suggested, on the basis that the provision is included in CSA N293.
119	OPG, NB Power, Bruce Power	4.12 Security	<p><b>Industry Issue:</b> Requested information is largely prescribed. Understood it is required for Commission.</p> <p><b>Suggested change:</b> Recommend clarifying application is to reference legal requirements and REGDOCs for compliance and address in generalities. Suggest referencing CNSC guide on confidential filings.</p>	<p>Added text as follows:</p> <p><b>Note:</b> Any information considered classified, protected, proprietary or personal should be submitted in accordance with the CNSC's <i>Guidance Document on Confidential Filings</i> [nn]."</p> <p>Also, the document has been added to the References section and all references have been adjusted as needed.</p>
120	OPG, NB Power, Bruce Power	4.12.1	<p><b>Industry Issue:</b> The requirement to update the TRA is embedded in the Nuclear Security Regulations; there is no need to repeat similar statements in the LAG.</p> <p><b>Suggested change:</b> Delete:</p> <p>"The applicant should ensure that the TRA will be an ongoing process that continuously monitors for any change in the threat environment."</p>	Text has been deleted as suggested.
121	OPG, NB Power, Bruce Power	4.12 Page 66	<p><b>Industry Issue:</b> Requirements for security officers are covered under the Nuclear Security Regulations and related regulatory documents.</p> <p><b>Suggested change:</b> Remove reference to the Provincial Private Investigators and Security Guards Act, as it is irrelevant.</p>	Text has been deleted as suggested.

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122	OPG, NB Power, Bruce Power	4.12.5 Page 68, top of page	<p><b>Industry Issue:</b> REGDOC 2.12.2 is a more appropriate reference for security officer training.</p> <p>Recommend replacing the language in section 4.12.5 with modified language provided to the right.</p> <p><b>Suggested change:</b> Revise [Amend] to read:</p> <p>“The program shall describe measures in place to ensure response personnel are trained and capable of performing duties described in section 30 of the Nuclear Security Regulations and in accordance with training requirements specified in REGDOC 2.12.2, High Security Site: Nuclear Response Force. <del>REGDOC 2.2.2, Personnel Training.</del> [5] Testing includes conducting realistic drills and exercises to test the performance of security systems, processes, procedures and personnel.”</p>	Text and references have been revised as suggested.
123	OPG, NB Power, Bruce Power	Appendix B Regulatory Documents and Industry Standards	<p><b>Industry Issue:</b> Not all sources listed in Appendix B are current requirements nor proposed in upcoming licence. Some requirements have been requested by CNSC that are not listed (REGDOC 2.3.3 PSR; N288.7 Groundwater Protection...; N292.0 General Principles for the Management ..., REGDOC 2.12.3 Security of Nuclear Substances...)</p> <p><b>Suggested change:</b> Review with [Industry] [COG] and revise list</p>	<p>The lists of documents in Tables C1 (was B1) and C2 (was B2) have been reviewed and adjusted.</p> <p>The CNSC will also provide applicants and licensees with supplemental guidance that includes additional details.</p>

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124	OPG, NB Power, Bruce Power	Table B1 Page 76  <b>MAJOR</b>	<p><b>Industry Issue:</b> The use of REGDOC-2.3.2, Accident Management, version 2 should be removed from the guide. The version of the REGDOC inappropriately groups design basis events with severe accidents. These two distinct entities are handled much differently and should not have combined requirements. Currently licensees do not have their programs set up this way and it wrong to do so.</p> <p><b>Suggested change:</b> Delete the requirement to use version 2.</p> <p><b>Impact on Industry:</b> REGDOC-2.3.2, <i>Accident Management</i>, version 2 is not implementable as written. There is no path to compliance with this document.</p>	No change; see response to comment #9.
125	OPG, NB Power, Bruce Power	Table B1 Page 76	<p><b>Industry Issue:</b> The SCAs numbering referred within Appendix B should be also listed in Table from Appendix A.</p> <p><b>Suggested change:</b> Add numbering of SCAs in Appendix A.</p>	Numbering has been added as requested.
126	OPG, NB Power	Table B2 Page 78	<p><b>Industry Issue:</b> Why is N393 listed as document here? Compliance with N293 (contained in Table B1) should be adequate as it covers the requirements for a NPP.</p> <p><b>Suggested change:</b> Clarify application of 393 to license facilities that store process, handle or nuclear substances. Delete N393 from table B2.</p>	Document N393 has been deleted from Table B2, as suggested.
127	OPG, NB Power	Glossary	<p><b>Industry Issue:</b> Suggest to include definition on Design-Extension Conditions (DECs), initially discussed in section 4.5.9.</p> <p><b>Suggested change:</b> Include definition of DECs in glossary.</p>	<p>Added the definition that appears in REGDOC-3.6, <i>Glossary of CNSC Terminology</i>:</p> <p><b>design extension conditions (DEC)</b> (<i>conditions additionnelles de dimensionnement [CAD]</i>)                      A subset of beyond-design-basis accidents that are considered in the design process of the facility in accordance with best-estimate methodology to keep releases of radioactive material within acceptable limits. Design extension conditions could include severe accident conditions. DEC is a plant state.</p>

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**Table C: “Feedback on comments” (opportunity to provide feedback on the comments received):**

	<b>Reviewer</b>	<b>Section or Para. #</b>	<b>Reviewer’s Comment and Proposed Change</b>	<b>Response</b>
a)			No “feedback on comments” was received.	