



February 27, 2017

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

Dear Mr. Torrie:

Canadian Nuclear Association Comments on REGDOC 1.4.1: License Application Guide: Class II Nuclear Facilities and Prescribed Equipment

The Canadian Nuclear Association (CNA) and its members would like to thank the CNSC for the opportunity to comment on REGDOC 1.4.1.

CNA would like to acknowledge the CNSC's efforts to apply suggestions made in discussions around other documents (notable REGDOC 1.3.1) to this draft. It is our view that this has resulted in a more clearly written REGDOC than initial drafts of other documents.

Notwithstanding the above comment, industry met to conduct a collaborative review of REGDOC 1.4.1 and our detailed comments are attached. However, I would like to highlight a couple of key points:

- As with many draft CNSC documents, there are a number of circumstances where the draft causes a significant increase in regulatory burden without demonstrating how a clear safety benefit could be gained from the change. There are several examples listed in the attached table. REGDOCs should demonstrate a clear safety benefit if they increase regulatory burden.
- There are a number of instances in the REGDOC where it paraphrases clauses in the regulations. This only serves to create confusion and can be addressed by using the actual wording of the regulations. If further clarification is needed than it can be done by clarifying the regulations themselves.
- Like many other initial drafts this REGDOC there are multiple occasions where regulatory requirements and guidance are mixed together. Specific examples are cited in the attached comments. CNA and our members have made this point regarding other REGDOCs. If the licensee is required to meet guidance criteria it is not guidance but a requirement.



CNA and its members look forward to having an opportunity to discuss these comments especially those that seem to be reoccurring throughout the REGDOC consolidation process.

Sincerely,

A handwritten signature in blue ink, reading 'Steve Coupland', is positioned below the word 'Sincerely,'.

Steve Coupland
Director, Regulatory and Environmental Affairs
Canadian Nuclear Association

