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July 28, 2016

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



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FILE	DOSSIER
REFERRED TO	REFERÉ À

1-8-8-0
Torrie, B.

Dear Mr. Torrie:


Subject: Comments on draft REGDOC-1.1.3 Licence Application Guide- Licence to Operate a Nuclear Power Plant

The purpose of this letter is to provide NB Power's comments on the draft REGDOC-1.1.3 *Licence Application Guide- Licence to Operate a Nuclear Power Plant* (Reference 1). NB Power's Point Lepreau Nuclear Generating Station (PLNGS) has collaborated with Bruce Power and Ontario Power Generation to review the proposed draft regulatory guidance document in detail.

PLNGS is supportive of this initiative to develop regulatory guidance and appreciates the opportunity to provide input to strengthen the licencing process. Comments have been provided (Attachment 1) recommending changes for improving the regulatory guidance.

NB Power is prepared to clarify our comments and concerns. If you require additional information, please contact Scott Demmons at 506-659-6557 or sdemmons@nbpower.com.

Sincerely,



Brett Plummer
Site Vice President and Chief Nuclear Officer

BP/RG/SD

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cc. Ben Poulet, Pierre Bélanger, Lisa Love-Tedjoutomo, Bruno Romanelli (CNSC - Ottawa),
consultation@cnscccsn.gc.ca
CNSC Site Office
Jason Nouwens, Rick Gauthier, Al MacDonald (NBP)

Reference:

1. Canadian Nuclear Safety Commission REGDOC-1.1.3 *Licence Application Guide- Licence to Operate a Nuclear Power Plant* (dated May 2016).

Attachment:

1. Comments – REGDOC-1.1.3 Licence Application Guide- Licence to Operate a Nuclear Power Plant.

Industry Comments on draft REGDOC-1.1.3, Licence Application Guide: Licence to Operate a Nuclear Power Plant – Attachment 1

#	Document Section/ Excerpt	Industry Issue	Suggested Change (if applicable)	Major Comment/ Request for Clarification ¹	Impact on Industry, if major comment
1.	General comment	This guide repeatedly reiterates the need to demonstrate requirements for a licence.	<p>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>NOTE* The risk of PARAPHRASING is recurring theme in this document, one that is also referenced in comments 5, 24 & 68</p>	Clarification	
2.	General comment	There is no reference to <i>GD-379 Guide for Applicants and Interveners Writing CNSC Commission Member Documents</i> .	CNSC to include link to GD.	Clarification	
3.	General comment	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	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.	Clarification	

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4.	General comment	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.	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 streamline exactly what it requires for a licence application. NOTE* The CNSC should consider differentiating between new applicants and those renewing licences, 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.	MAJOR	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.
5.	General, especially Section 4	Many requirements listed are taken from various REGDOCs and CSA Standards. These requirements should not be paraphrased.	Simply refer to the specific REGDOC 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.	MAJOR	All requirements should be given in a single regulatory document. Having differing requirements in more than one document makes compliance difficult and complex.

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6.	Preface pg i	<p>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>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 requirements <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 6th paragraph to say, "A graded approach, commensurate with risk, may be defined and used when applying the requirements <i>instructions, direction</i> and guidance contained in this regulatory document."</p>	MAJOR	<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 of this in this draft REGDOC, and suggested alternative language, is offered in our detailed comments.</p>
7.	Preface pg i	<p>It is not reasonable to state, '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>Guidance is meant to be guidance, if the licensee is required to meet guidance criteria, then it is requirement, not guidance.</p>	<p>Revise wording to, 'Licensees and applicants 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>	MAJOR	<p>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 a requirement, not guidance.</p>

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8.	Preface pg i	Under Important note, indirect references are not automatically part of the licensing basis	Revise to say, "Important note: Where directly referenced in a licence, this document is part of the licensing basis for a regulated facility or activity."	Clarification	
9.	1.3 Page 2	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." This places the onus on licensee to resolve conflicts between agencies with no authority to do so. 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.	Revise text so that the CNSC has the lead to help resolve issues with other regulatory agencies.	MAJOR	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.
10.	2.2 paragraph 6, 1 st sentence. pg 3	The word 'limit' in the PSR description creates a negative connotation when industry views PSRs as a tool for continuous improvement.	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 would limit could be improved to support continued safe operation.'	Clarification	

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11.	2.2 paragraph 6, 2nd sentence, pg 3	The requirements for the IIP are already stated in REGDOC 2.3.3. Potential inconsistency with REGDOC 2.3.3 and current practice.	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 the requirements for repairs, replacements and modifications safety improvements to be carried out by the licensee during the next license period.	MAJOR	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.
12.	2.2 pg 4	The title for REGDOC 2.3.3 is wrong (mistakes <i>Integrated Safety Reviews</i> with <i>Periodic Safety Reviews</i>).	Correct the title to <i>REGDOC 2.3.3: Periodic Safety Reviews</i> .	Clarification	
13.	2.2	INFO-0756 R1 superseded by REGDOC-3.1.5	Replace reference.	Clarification	
14.	2.2	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.	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	MAJOR	Need clarity on guidance for both renewal and new licenses .
15.	2.2.2 Page 3, 2 nd last paragraph	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.	Suggested change: "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).	MAJOR	This could require licensees to do PSRs more frequently than the existing regulatory requirements at great cost.

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16.	2.2.2 Top of page 4	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.	Suggested change: Revise to, "... shall be completed in either of Canada's official languages, that is, English or French."	Clarification	
17.	2.3 Page 4	If electronic submission is encouraged, then printed, signed hard copies should not also be required.	Revise to allow either electronic or printed but not both.	Clarification	
18.	3	Industry feels it's inappropriate to give out direct contact information for senior staff to the public	Remove this request or generalize it to corporate contact information.	MAJOR	For safety and privacy reasons, Industry feels direct contact information for senior staff should not be divulged to the public.
19.	3 Pg. 5-7	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.	Examples: 3.1 Identification and contact information 3.1.1 Current licence number (for renewal) or 3.1 Identification and contact information a) Current licence number (for renewal).	Clarification	
20.	3	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.	Separate or distinguish between requirement and guidance. Where a statement is there to satisfy a regulatory requirement, perhaps the regulatory requirement could be cited.	Clarification	

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21.	3.1 Paragraphs 4 and 5	<p>“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>	Use the wording from the regulations.	Clarification	
22.	3.1 and 4.1.3 Pages 6 and 13	Section 4.1.3 repeats some of what was to be provided in Section 3.1.	Avoid repetition in the document.	Clarification	<p>Examples of where requested information is repeated:</p> <ul style="list-style-type: none"> - 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”.
23.	3.1 Paragraphs 13 and 15	<p>“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>	Combine these paragraphs.	Clarification	
24.	3.2 Paragraphs 3 and 6	<p>“Statement of the main purpose Provide a summary of the main purpose, and a list of all activities to be licensed for this facility”</p> <p>“Nuclear substances 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>	Quote the regulatory requirements, don't paraphrase.	MAJOR	Paraphrasing can change the meaning of the original statement.

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25.	3.3 Paragraph 3	<p>“Similar facilities 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>	Modify as noted in industry issue.	Clarification	
		This guidance could apply for a new licence but is not necessary for a license renewal of an existing facility.			
26.	3 and 4.1	<p>This section addresses the requirements of the following regulations made under the NSCA:</p> <ul style="list-style-type: none"> - General Nuclear Safety and Control Regulations, paragraphs 3(1)(a), (b), (c), (k) and (m) and sections 15 and 27 - Class I Nuclear Facilities Regulations, paragraphs 3(c), (i) and (j) <p>The licence application should include the following general information”</p>	“Should” is used in some cases where reference is made to satisfying the regulations. In these cases it needs to be “shall”.	Clarification	<p>Examples of where “should” is used inappropriately are:</p> <ul style="list-style-type: none"> - 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. - 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.
27.	4 Pg. 9 , last paragraph	Remove the reference to requirement in the following statement, ‘The requirements 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.’	Remove the statement on requirements and suggest using wording similar to that in Section 1.1 to say, ‘The requirements <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.’	MAJOR	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.

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28.	4 Bottom of p.10, 2 nd last paragraph	Refers to an environmental impact statement (EIS), but a licence renewal for an existing NPP does not need an EIS.	Delete mention of EIS in this paragraph.	Clarification	
29.	4 page 10	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.	Discussions on the management of the Appendix B documents should occur between the Licensees and the CNSC. A workshop is requested to address this and the other industry comments on this REGDOC.	MAJOR	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.
30.	4 Page 10 Paragraph 3	<p>“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>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>	MAJOR	These requirements are beyond what is required in the regulations.
31.	4 Page 10 Paragraph 3	<p>“... 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>	Delete	MAJOR	This is a requirement created by the guide and it shouldn't be.

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32.	4.1 Page 12	Language is inconsistent with Section 4.1.2 of CSA N286-12, <i>Requirements for an integrated management system</i>	Align with language in N286-12 standard to ensure consistency of understanding, implementation and application by saying, 'The management system SCA covers the framework that establishes the processes and programs required to ensure an organization achieves its safety objectives health, safety, security, environment, quality, and economic (with regards to safe operations) objectives, continuously monitors its performance against these objectives, and fosters a healthy safety culture.'	Clarification	
33.	4.1.1 Page 12	Intent is unclear in the sentence, 'The application should also describe the safety policies, the roles of safety assessment organizations ... Use of organization implies external to the applicant, is that the intent?		Clarification	
34.	4.1.2 Page 12	Unclear what is meant by observance in the sentence, 'The application should describe the measures taken to ensure the implementation and observance of the management system procedures.' What does "observance" mean in this context?		Clarification	
35.	4.1.2 Page 12	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 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.	Rewrite to say, 'The application should describe how management will make its high-level expectations clear to all personnel, through formal and well-publicized statements on elements of its management system such as its vision, mission, core values, guiding principles, safety policy and commitment to foster a healthy safety culture.'	Clarification	

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36.	4.1.2 Page 12	<p>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>Rewrite to say, ‘The applicant should confirm that personnel responsible for checking compliance have access, whenever required, to senior levels of the applicant’s management structure.’</p> <p>This is another example of where we are reproducing the requirements in this document rather than referring to the actual standards.</p>	Clarification	
37.	4.1.2 Page 12	<p>Use of the word ‘program’ in the sixth paragraph may be imprecise. Not all licensees may have a “program”</p>	<p>Rewrite to say, ‘The applicant should describe the procurement program approach/process/ governance for licensed activity use.’</p>	Clarification	
38.	4.1.2 Page 13, first paragraph	<p>Lack of clarity with the statement, ‘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 EACH good or service to be procured are met</p>	<p>Replace “of each good and service” with “for goods and services”.</p>	Clarification	

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39.	4.1.3 Page 13, second paragraph	<p>Clarification required for the lines, “The application should describe:</p> <ul style="list-style-type: none"> • 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) • the approach, programs and processes proposed for staffing and service procurement • the monitoring and management of contractors”. 	<p>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>	Clarification	
40.	4.1.3 Page 13	<p>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>Rewrite to say, ‘The applicant should document the organizational structure, including all positions with responsibilities authority for the management and control of the licensed activity.’</p>	Clarification	
41.	4.1.3 Page 13	<p>“... including all positions with responsibilities for the management and control of the licensed activity” This is repeated from paragraph 3 on pg 6.</p>	<p>Remove duplication in the document.</p>	Clarification	
42.	4.1.3 Page 13	<p>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). What are ‘components’ in this context? Organization units or something more/other? People are qualified, not components.</p>		Clarification	

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43.	4.1.4 Page 13	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.'	Clarify what is meant by "review program" Audit is understood.	Clarification	
44.	4.1.4 Page 13	This section contains discussion on what licensee programs need to contain or accomplish. This is not the right document for that sort of content.	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.	MAJOR	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.
45.	4.1.4 Page 13	Unclear what is being referenced in the fourth paragraph, which begins, 'The program should ensure that....'	Rather than use the term "program" suggest using the term "process."	Clarification	
46.	4.1.4 Page 13	The fifth paragraph is too far reaching. Where is consideration of the graded approach? The human factors inclusion is a significant change.	Rewrite to say, 'The applicant should demonstrate that the analysis of the causes of all significant 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.	Clarification	

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47.	4.1.6 Paragraph 2	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. NOTE: This is a good example where process is used properly rather than program, as per comment 44.	The applicant should demonstrate that processes are in place to evaluate the safety significance of proposed modifications, including the requirements for seeking CNSC approvals or providing notification where necessary.	Clarification	
48.	4.1.6 Paragraph 3	“Any modifications to SSCs are subject to approval by an authorized inspection agency acceptable to the CNSC.” 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.	Delete	MAJOR	This statement is not correct and is beyond the scope of what this document should include.
49.	4.1.6 Page 14	Third paragraph, imprecise use of the word program Doesn't need to be called a 'program'	Rewrite to say, 'For pressure boundary SSCs, the application should describe the arrangements that have been made to ensure the related quality assurance program requirements are established in governance, ...'	Clarification	
50.	4.1.7 Page 15	Imprecise use of the word program in first sentence. Licensees do not have standalone safety culture programs, but elements throughout all parts their organizations that promote a healthy safety culture.	The applicant should demonstrate that the following elements and characteristics are included in a addressed in support of a healthy safety culture program .	Clarification	
51.	4.1.7 Page 15	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.	Rewrite to say, 'safety culture applies throughout the organization; i.e., everyone in the organization has an obligation to ensure that safety is the top priority paramount consideration guiding decisions and actions.'	Clarification	

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52.	4.1.7 Page 15	The use of the word continually in the third paragraph is too far reaching. Continually promoted and assessed is a difficult burden of proof....	Rewrite to say, 'The application should clearly state how safety culture will be continually promoted and regularly assessed throughout the organization.'	Clarification	
53.	4.1.8 and 4.1.9	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>If the requirements identified in this document are included in existing Codes/Standards/REGDOCs then they should not 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>	MAJOR	See the similar comment in section 4.1.4.
54.	4.1.9 Page 15	There is no requirement in the regulations for the submission of a business continuity plan. 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.	Delete Section 4.1.9	MAJOR	This requirement goes beyond the requirements of the regulations. The Licence Application Guide should not be setting requirements.

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55.	4.2.1 Succession Planning	<p>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>Suggested change:</p> <p>Revise “the succession plan” to “the workforce planning process”</p> <p>Application should provide process only, not the specific details.</p>	Clarification	
56.	Section 4.2.1	Listing all staff and contractors skills and competencies would be impractical	<p>Suggested change: “The application should describe the qualifications, adequate numbers, skills and competencies required by personnel (both staff and contractors) at the facility.”</p>	Clarification	
57.	Section 4.2.3 First paragraph, p. 16	<p>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>Align the wording of REGDOC 1.1.3 to the wording used in REGDOC 2.2.2.</p> <p>For example: <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>	MAJOR	<p>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>
58.	Section 4.2.3 p. 17 Last paragraph	The requirement to complete a training needs analysis is included in REGDOC 2.2.2.	Delete this paragraph.	MAJOR	All requirements should be given in a single Regulatory document.

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59.	Section 4.2.4 p. 17 First paragraph, and Section 4.2.5 p. 18 First paragraph	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.	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 that REGDOC to a much higher level document.	Clarification	
60.	Section 4.2.4 p. 17 Third paragraph.	The last sentence is unclear when it says, "The application should include information on the personnel required for certification-related activities on the full-scope training simulator." Cost and burden may be excessive if the list is unbounded.	Revise to clearly specify which personnel the document is referring to, e.g. trainers, maintainers, etc.	Clarification	
61.	Section 4.2.4 p. 17, last paragraph.	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.	Revise the paragraph to clearly state the individual requirements.	Clarification	
62.	Section 4.2.5 p. 18 Second paragraph	The requirement to comply with CNSC EG1 and EG2 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 the REGDOC that describe the certification examination requirements.	Modify the document to clearly identify the minimum examination requirements for positions requiring examination. Revise CNSC-EG1 and EG2 so that they are applicable to all types of NPPS. Rewrite those documents to be much higher level documents.	Clarification	
63.	4.2.5 Reference to EG1, EG2	These documents are in to the process of being superseded by a new REGDOC.	Update reference	Clarification	
64.	Section 4.2.5 p. 18 Second paragraph	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.	Delete " <i>Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants, Revision 2</i> " from this paragraph.	MAJOR	It is not appropriate to require determination of how to apply current requalification testing requirements to the development and conduct of initial examinations.

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65.	Section 4.2.7 p. 18 First paragraph	RD-204 is currently only applied to workers whose positions require certification.	Revise wording to: “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> ” Consider referring to REGDOC 2.2.4 – Fitness for duty.	MAJOR	Cost and burden may be excessive if required to meet the current RD-204 requirements for all workers.
66.	4.3.1 Page 19	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, the Class I Nuclear Facilities Regulations and the Radiation Protection Regulations</i> ’. There are no limits that apply to NPPs in the General Nuclear Safety and Control Regulations or the Class I Nuclear Facilities Regulations.	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> .	Clarification	
67.	4.3.1 Paragraph 1	“... 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.” This statement is very vague and broad.	Suggest changing to ‘... any APPLICABLE provincial legislation or other applicable codes and standards’.	Clarification	

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68.	4.3.1 Paragraph 2	<p>“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>	It would be more clear to state that the application should describe the conduct of operations process including the approved operating procedures ...	Clarification	
69.	4.3.2 Page 20	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.’	Reference should be made to the process for validation and implementation rather than requesting the actual validation and implementation.	MAJOR	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.
70.	4.3.3 Page 20	If this is intended to be technology neutral, the wording in the third paragraph should be changed.	Suggest technology neutral wording to say, ‘The information submitted should describe how the applicant will comply with limits imposed by the design and safety analysis assumptions – specifically for <i>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.’	Clarification	
71.	4.3.3 Page 20, 2nd paragraph	SOE conditions are not necessarily associated with limits.	Reword to say, ‘The application should state the safe operating limits and conditions ...’	Clarification	

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72.	Section 4.3.3 p. 20 Third paragraph	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.” Is the requirement that an input to the SAT-based training is the	Revise the document to clearly define the requirement being addressed.	Clarification	
		definition/documentation of the safe operating envelope?			
73.	4.3.3 Paragraph 5	“If a currently-licensed facility is transitioning to a safe operating envelope (SOE) program from ...” All Canadian nuclear facilities are compliant with CSA N290.15	Delete this paragraph.	Clarification	
74.	4.3.3 Page 20, final paragraph	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. That 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&Ps to SOE. However, those aspects are not part of SOE but are addressed in other programs. It is inconsistent with the definition of Safe Operating Envelope in CSA N290.15	Suggest removing this paragraph from the safe operating envelope section or moving it to section 4.2 (Human Performance Management).	Clarification	
75.	4.3.4 Paragraph 1	“... periodic shutdowns ...” Is this referring to planned maintenance outages?	Clarify the reference.	Clarification	

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76.	4.3.4 Page 21	<p>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 outage related reports. This doesn't need to be in this guide. 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>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>	MAJOR	<p>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.</p>
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77.	4.3.5 Pages 21 & 22	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.	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.	MAJOR	REGDOC-2.3.2, <i>Accident Management</i> , version 2 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.
		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...'			
78.	Section 4.3.5 p. 22 First set of bullets, seventh bullet	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.	Revise the document to clearly define the requirement being addressed.	Clarification	

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79.	4.3.5 Page 22, final paragraph	The statement duplicates information in section 4.10.2 and should be deleted from this section.	Delete the following sentence: '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.'	Clarification	
80.	4.4 Page 23	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. This is another comment supporting the need to distinguish between new applications and license renewals.	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 & packaging the previous information is needed.	MAJOR	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.
81.	4.4 and 4.4.1 Page 23	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. This guide should avoid repeating similar concepts that are stated differently.	Delete the first paragraph under section 4.	Clarification	
82.	4.4.2 Page 23	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.	Remove reference to REGDOC-2.5.2	MAJOR	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.

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83.	4.4.3 Page 23 (bottom of page) NSAS	<p>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>Modify the final line to state, "The application should describe the trip coverage and trip set points" or please provide more clarity on what is required on dose limits.</p>	Clarification	
84.	4.4.3 Page 24 (top of page)	<p>Normally, safety analysis does not consider the details specified in the first bullet, i.e., "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." This part should not be under Deterministic Safety Analysis. These are part of the design of the plant.</p>	<p>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 say, 'Applicable dose limits doses under design-basis accidents (DBAs) are met' since dose limits under DBA can be different depending on SF or DF.</p>	Clarification	
85.	4.4 Page 24	<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>Remove reference to REGDOC-2.5.2</p>	MAJOR	<p>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>
86.	4.4.4 paragraph 2	<p>"This analysis should include all potential hazards (internal and external), both natural and human induced." This statement is too broad.</p>	<p>Delete paragraph 2</p>	MAJOR	<p>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>
87.	4.4.5 and 4.4.6 and others	<p>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>Delete these descriptions/discussions.</p>	MAJOR	<p>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:</p> <ul style="list-style-type: none"> - 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.

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88.	4.4.6 Page 25	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.	Delete the requirement to use version 2.	MAJOR	REGDOC-2.3.2, <i>Accident Management</i> , version 2 is not implementable as written. There is no path to compliance with this document.
89.	4.4.8 Page 26	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.	Delete the requirement to use version 2.	MAJOR	REGDOC-2.3.2, <i>Accident Management</i> , version 2 is not implementable as written. There is no path to compliance with this document.
90.	4.5 Description of SSCs	“For each SSC, the application should describe in detail the characteristics, major components and design basis requirements” This may be applicable to a new license but not a renewal for an existing facility.	Confirm this information is really required. Similar concerns with sections following.	Clarification	
91.	4.5.17 Class II facilities and laboratories	If these facilities are separately licensed, detailed information should not be required, as these would not be included as licensed activities for the application	Revise wording such that information is required only if included as licensed activities under the Class I licence.	MAJOR	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.
92.	4.6 Page 47	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.	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.	MAJOR	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. 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.

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93.	4.6.1 Page 47	Lack of clarity. As a literal interpretation, the statement as currently written would require the application to list hundreds of thousands of components.	Rewrite to say, 'The application should identify all SSCs 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.'	Clarification	
94.	4.6.2 Page 47	The word always 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	Rewrite to say, 'Reliability programs establish processes to demonstrate that SSCs are always capable of performing their design function in accordance with predefined specifications.'	Clarification	
95.	4.6.2 Page 47	Current wording is too specific and not consistent with references in RD/GD 98.	Suggest that reference be made to RD/GD 98 and NOT specify the wording from RD/GD 98.	MAJOR	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.
96.	4.6.3 Page 47 Last paragraph	The purpose of the maintenance program is not to prevent future degradation, as stated in this sentence.	Reword to say, 'The maintenance program should include processes for planning, monitoring, scheduling and executing work activities that ensure SCCs continue to meet design specifications, prevent future degradation, or correction of current failure and impairments perform the design intent and remain fit for service in the presence of degradation mechanisms.'	Clarification	
97.	4.6.4 Page 48	Improper requirement for fourth bullet under aging management program section Requirements should be on having a process, similar to other bullets in this Section.	Amend bullet to say, 'evaluation process for aging management '.	Clarification	

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98.	4.6.4 Page 48	Lack of clarity with ninth bullet under aging management programs. Without the inclusion of the words SSC-specific, it's unclear what is meant.	Amend bullet to say, 'implementation of SSC- specific aging management programs'.	Clarification	
99.	4.6.4 Page 49, top of page	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.	Amend to read, '....and any preventive actions necessary to minimize and control aging degradation of the SSCs.'	Clarification	
100.	4.6.5 Page 49	Suggest removing words like minimize and minimization from bullets under chemistry control program. As above, reword to remove the words minimize and minimization.	Amend bullets to read, <ul style="list-style-type: none"> • manage minimize the harmful effects of chemical impurities and corrosion on plant SSCs • support the minimization ALARA principle to manage the buildup of radioactive material and occupational radiation exposure 	Clarification	
101.	4.6.5 Page 49	Clarify the sixth paragraph under chemistry control program.	Amend to read, 'The applicant should include describe provisions for a post-accident sampling system or other adequate sampling facility.'	Clarification	
102.	4.6.6 Page 50	Clarify bullet 5 by adding nuclear to modify safety. Clarification requested on definition of 'safety' being applied here, i.e. is it reactor safety, as opposed to industrial safety?	Amend bullet to read, 'balance-of-plant pressure boundary components important to nuclear safety'	Clarification	
103.	4.7.3 Page 53	<p>"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>Remove first sentence in paragraph.</p> <p>Could add that: "The applicant should describe how their program will provide adequate quantities and types of equipment."</p>	MAJOR	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.

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104.	4.8 Page 55	The existing NPPs are not subject to the Canada Labour Code Part II.	Add a statement on the New Brunswick / Ontario Occupational Health and Safety Acts. Suggested wording, 'It also addresses the requirements of the <i>Canada Labour Code Part II</i> or the provincial <i>Occupational Health and Safety Acts</i> for existing NPPs.'	MAJOR	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.
105.	4.9.1 Page 56	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. 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.	Need to clarify scope. As written, the statement could be interpreted as all process system components that maintain the pressure boundary.	Clarification	
106.	4.9.1 Page 56	BATEA should be a consideration in REGDOC-2.5.2 only and deleted here.	Need to distinguish between a new license application and a renewal for an existing application.	MAJOR	Existing facilities cannot be redesigned and must operate within the existing design.
107.	4.10 and 4.11 Pages 61 and 63	<ul style="list-style-type: none"> - Class I Nuclear Facilities Regulations, paragraphs 3(f), 6(k) and 7(i) - Class I Nuclear Facilities Regulations, paragraphs 3(f) and (k), 4(e), 6(h), (i) and (j), and 7(f) and (k) <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>	Delete reference to items 7(i), 7(f) and 7(k).	MAJOR	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.
108.	4.10.1 Page 61	There is no requirement in the regulations for the submission of a pandemic plan. This is also addressed in comments on 4.1.9	Delete: "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."	MAJOR	This requirement goes beyond the requirements of the regulations. The Licence Application Guide should not be setting requirements.

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109.	4.10.4 Page 62	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.	Delete, 'The program should include provisions for a third party audit of the industrial fire brigade once every two years.'	MAJOR	The Licence Application Guide should not be setting requirements.
110.	4.12 Security	Requested information is largely prescribed. Understood it is required for Commission.	Recommend clarifying application is to reference legal requirements and REGDOCs for compliance and address in generalities. Suggest referencing CNSC guide on confidential filings	Clarification	
111.	4.12.1	The requirement to update the TRA is embedded in the Nuclear Security Regulations; there is no need to repeat similar statements in the LAG.	Delete: "The applicant should ensure that the TRA will be an ongoing process that continuously monitors for any change in the threat environment."	Clarification	
112.	4.12 Page 66	Requirements for security officers are covered under the Nuclear Security Regulations and related regulatory documents.	Remove reference to the Provincial Private Investigators and Security Guards Act as it is irrelevant.	Clarification	
113.	4.12.5 Page 68, top of page	REGDOC 2.12.2 is a more appropriate reference for security officer training. Recommend replacing the language in section 4.12.5 with modified language provided to the right.	Amend to read, '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. REGDOC 2.2.2, Personnel Training. [5] Testing includes conducting realistic drills and exercises to test the performance of security systems, processes, procedures and personnel.	Clarification	

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114.	Appendix B Regulatory Documents and Industry Standards	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...)	Review with COG and revise list.	Clarification	
115.	Table B1 Page 76	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.	Delete the requirement to use version 2.	MAJOR	REGDOC-2.3.2, <i>Accident Management</i> , version 2 is not implementable as written. There is no path to compliance with this document.
116.	Table B1 Page 76	The SCAs numbering referred within Appendix B should be also listed in Table from Appendix A.	Add numbering of SCAs in Appendix A.	Clarification	
117.	Table B2 Page 78	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.	Clarify application of N393 to license facilities that store process, handle or nuclear substances Delete N393 from table B2.	Clarification	
118.	Glossary	Suggest to include definition on Design-Extension Conditions (DECs), initially discussed in section 4.5.9.	Include definition of DECs in glossary.	Clarification	