

May 12, 2016



NK21-CORR-00531-12826
NK29-CORR-00531-13278
NK37-CORR-00531-02559

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:

Bruce Power comments on draft annex to REGDOC-2.2.2. Personnel Training

The purpose of this letter is to provide Bruce Power's comments on additional guidance the CNSC has drafted to help licensees implement the requirements for a radiation safety training program. This proposed guidance is provided as an annex to REGDOC-2.2.2, Personnel Training.

Bruce Power, which has collaborated with Ontario Power Generation, New Brunswick Power and Canadian Nuclear Laboratories to review the draft annex, appreciates its attempt to provide practical examples for industry to consider as it develops and implements systematic training programs.

Before adding this annex to REGDOC-2.2.2, we encourage the CNSC to ensure the terminology used in the draft examples aligns with those in the regulatory document to avoid inadvertent confusion. We also encourage the CNSC to consider the industry's collective comments in Appendix A, which are intended to further clarify the proposed guidance.

If you require further information or have any questions regarding this submission, please contact Maury Burton, Department Manager, Regulatory Affairs, at 519-361-5291.

Yours truly,

A blue ink handwritten signature, appearing to read 'Frank Saunders', with a long horizontal flourish extending to the right.

Frank Saunders
Vice President Nuclear Oversight and Regulatory Affairs
Bruce Power

cc: CNSC Bruce Site Office (Letter only)
K. Lafrenière, Director, Bruce Regulatory Program Division

Attach.

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Bruce Power Frank Saunders Vice President - Nuclear Oversight and Regulatory Affairs
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Attachment A

Bruce Power comments on draft annex to REGDOC-2.2.2. Personnel Training

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#	Document/ Excerpt of Section	Industry Issue	Suggested change (if applicable)	Major Comment / request for clarification ¹	Impact on industry if major comment
1.	REGDOC 2.2.2	REGDOC 2.2.2 will have to be revised to reference the new Annex. Industry needs to review the revised REGDOC to be able to comment completely on the proposed Annex.	CNSC to publish for comment the revised draft of REGDOC 2.2.2 that includes the draft Annex.	MAJOR	The full impact is unknown without seeing how the Annex will be referenced.
2.	Annex A	Does this example ONLY apply to Nuclear Substances and Radiation Devices, and with Class II Nuclear Facilities and Prescribed Equipment? Annex seems to include details that could easily be applied to all training programs.	Include clear direction as to application of Annex in the REGDOC-2.2.2 body as to which types of licences it applies.	MAJOR	This Annex should only apply to those licensees.
3.	Page 2 table	Tables are excellent, but there is no mention of Enabling Learning Objectives under Step 2 – Design Phase or Step 3 – Development phase	Include both Terminal Learning Objectives and Enabling Learning Objectives in table to be consistent with the text in the REGDOC.	Clarification	
4.	Annex A page 3	Training Methods mentions “exams”. In the industry, examinations are normally associated with positions requiring certification by the CNSC.	Suggest revising “exams” to “assessments” to be consistent with the text in the REGDOC.	Clarification	
5.	Annex A page 3	Use of DIF numbers should be further explained. Does 5 mean important/frequent or not important/infrequent? In Training Description column it states “(task is highly important to safety and performed infrequently thus continuing training is needed)”.	Provide additional explanation on how to use the DIF rating system.	MAJOR	If it is not an example then this is a major concern as it will lead to significant changes in the training programs with no apparent added value.

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#	Document/ Excerpt of Section	Industry Issue	Suggested change (if applicable)	Major Comment / request for clarification ¹	Impact on industry if major comment
		Based on this text could the DIF be 351 or 315? Please confirm that this is an example only and not a requirement.			
6.	Annex A page 3	Standards column references Packaging and Transport of Nuclear Substances Regulations, 2015, Section ... This is too specific and may introduce confusion.	Remove references to other Regulations.	Clarification	
7.	Page 3 table	Identified "Job" statement is actually a task statement, and "Task" statements are task elements. (at least #1 and 2) This is misaligned with the REGDOC.	Clarify and align task vs. task elements – DIF rating should be performed on TASK rather than on multiple task elements.	MAJOR	Potential to force significant confusion, inconsistency and rework for utilities, if unclear, or if incorrectly applied during inspections.