

March 9, 2015

CD# N-CORR-00531-06829 P

MR. BRIAN TORRIE
Director General,
Regulatory Policy Directorate

Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Torrie:

**Submission of Ontario Power Generation's Comments on Draft CNSC REGDOC
2.2.3 Personnel Certification: Initial Certification Examinations**

The purpose of this letter is to submit Ontario Power Generation's (OPG's) comments in regards to Draft CNSC REGDOC 2.2.3 Personnel Certification: Initial Certification Examinations. OPG appreciates the opportunity to provide comments on the proposed regulatory changes, as input from the licensees is important for ensuring new and revised requirements can be achieved. OPG's comments also reflect input from our industry partners.

OPG is surprised by the extent of the new, and more restrictive requirements incorporated into the draft document. For example, guidance currently included in CNSC-EG1, Rev.0: *Requirements and Guidelines for Written and Oral Certification Examinations for Shift Personnel at Nuclear Power Plants (EG1)* and CNSC-EG2, Rev.0: *Requirements and Guidelines for Simulator-based Certification Examinations for Shift Personnel at Nuclear Power Plants (EG2)* have now become requirements for the initial certification examination processes. Some proposed requirements are not practical, or possible, and some that, if implemented as written, will result in the inability of licensees to certify new staff for critical operating positions. Overall, proposed changes will result in significant impact and cost to licensees, with no demonstrated improvement in safe operation.

Specific examples of new or increased requirements include, but are not limited to, the following:

- The “assurance that each examination is validated prior to conduct ...” This is currently done for requalification testing, but not for initial examinations, which are “verified”, a completely different process from validation.
- The “assurance of a high-quality audiovisual recording system capable of clearly recording the performance of the candidates during a certification examination...” is reasonable for a simulator-based examination, but is not the practice for the conduct of a written examination. The related new requirement, “An examination will not be recognized by the CNSC unless it has been properly recorded” could prove extremely costly to industry as, in the event of recording failure, the entire examination, already conducted, would need to be repeated. This also adds unnecessary stress to candidates already under significant pressure.
- Qualification requirements for Examiners and Lead Examiners are overly restrictive. These requirements are better defined and more clearly articulated within the current requirements of EG1 and EG2. These proposed changes would require significant time and resources to achieve, again with no demonstrable improvement in performance.
- The intensified pass criteria and the simultaneous increase in the complexity and difficulty of required examinations. These changes, as outlined in the draft REGDOC, appear without any identified operational issues with the current processes and will significantly impact a licensee’s ability to certify key staff.
- Examination follow-up requirements for the remediation of candidates who have actually passed an examination. This adds significant time and effort to an already stringent certification process.
- The requirement for 80% of the questions on the written/oral examinations to be newly designed and not based upon previous questions and the requirement to never reuse simulator-based examination scenarios. Once again, these add significant effort to examination preparation with no demonstrated benefit. Restricting the use of a question bank will quickly drive examination design away from the fundamental knowledge we expect of our certified staff. This undermines the Systematic Approach to Training basis of the training programs and the linkage back to performance of safety-related tasks.

OPG believes the document needs to be completely rewritten to:

- Ensure requirements are properly aligned with the intended outcomes and consistent with the fundamental principles of evaluation.
- Recognize that requirements must differ between written/oral examinations and simulator examinations.
- Remove the Policies and Procedures section, which is overly prescriptive as currently written. A REGDOC should define requirements such that licensees can determine how to meet them in their managed system. OPG also notes that Policies and Procedures do not provide “assurances”. Rather, they describe the purpose, instructions, requirements, references, roles and responsibilities.

- Remove the significant escalation in requirements.

OPG believes the current Canadian process for certifying highly-competent operating staff is already one of the most stringent in the world and has produced very capable graduates as evidenced by industry's operational performance and reflected in the CNSC Staff Annual NPP Reports. Compliance to the draft document as currently written would prevent licensees from certifying additional staff with a resulting negative impact on nuclear and public safety.

OPG strongly urges the CNSC to consult with stakeholders prior to considering the introduction of such significant changes in the current initial certification examination methodology. OPG believes a workshop should be convened to gather and address stakeholder issues with this current draft of REGDOC 2.2.3 and would welcome the opportunity to participate in such a forum.

If you require further information or have any questions regarding this submission, please contact me or Mr. Romeo Urjan, Manager, Fleet Operations Training, at 905-839-1151, extension 6619.

Sincerely,



K. DEHDASHTIAN

for

Robin Manley
Director

Nuclear Regulatory Affairs and Stakeholder Relations

cc:	B. Finigan	-CNSC Site Office (Pickering)
	A. Ling	-CNSC Site Office (Darlington)
	C. Moses	-CNSC (Ottawa)
	M. Santini	-CNSC (Ottawa)
	F. Rinfret	-CNSC (Ottawa)
	K. Heppell-Masys	-CNSC (Ottawa)