

From: Frank Laratta
Sent: Friday, November 08, 2013 1:27 PM
To: Mediarelations
Subject: Comments on Draft REGDOC-2.3.1, Commissioning of Reactor Facilities

Aurèle,

My name is Frank Laratta and I worked for AECL in Mississauga on the reactor overpower trips for many years until my retirement in 2004. I have advanced an argument in a CNS paper this year that “trip setpoint values cannot and must not be pre-determined by safety analysis ALONE. Only the functionality of `setpoints` with respect to signals monitored can be pre-determined. I have received no comment (favourable or unfavourable) from the industry. Further, individuals all decline any dialogue or response. It seems that all nuclear standards give human guidance to designers and operators but advance no technical requirements on setpoints or instrumentation.

The instruction for comment on **REGDOC-2.3.1** is as follows:

“This regulatory document also sets out requirements and guidance to ensure that commissioning activities meet applicable codes, standards, and design requirements, and that the reactor facility is capable of operating safely and reliably over its lifetime.”

What does one do if the “*applicable codes, standards, and design requirements*” are themselves flawed, misinterpreted or lacking in some way? I will make detailed comments and send them to CNSC.

I have commented, without being asked, on “**RD-310: Safety Analysis for Nuclear Power Plants**” and sent CNSC but have thus far not received feedback a few days ago. I am in the process of reviewing **RD-337**, which is much larger but I will not send comments unless I know they will be received.

I did also review but did not send to anyone:

Application of the CNSC Risk-informed Decision Making Process to Category 3 CANDU Safety Issues Development of Risk-Informed Regulatory Positions for CANDU Safety Issues

This latter document is, in my mind, closest to the problem to which I am referring.

I should tell you that related American and international documents are also:

1. vague and full of motherhood statements, e.g. “as low as reasonable possible” without establishing “what” is possible
2. lack objective criteria where they should exist, e.g. safety analysis and setpoint criteria

Regards,
Frank Laratta