From: Consultation
To: Belyea, Sean;
Subject: FW: REGDOC 2.10.1 - Nordion Comments
Date: Monday, October 21, 2013 6:03:37 AM

From: Epp, Michael [mailto:Michael.Epp@nordion.com]
Sent: Friday, October 18, 2013 4:04 PM
To: Consultation
Subject: REGDOC 2.10.1 - Nordion Comments

The following are comments from Nordion on the draft REGDOC 2.10.1, Nuclear Emergency Preparedness and Response.

1) In general, the applicability of these regulations to Class 1B facilities are not clear. They appear to be written specifically with reactor sites in mind and appear overly complex and prescriptive to apply to a lower risk, non-reactor facility.

The Scope section states that, "An EP program should be developed in a manner that is commensurate with the complexity of the facility's associated undertakings, as well as the probability and potential severity of the emergency scenarios with the operation of the licensed facility." However, the requirements within the REGDOC appear to be written commensurate with the risks, probability and potential severity of emergency scenarios at reactor sites versus those at a 1B facility like Nordion. The complexity and prescriptive detail of the regulations will not allow for appropriate scaling of the program to non-reactor facilities that have a lower risk profile and scenario impact.

Our concern is that compliance with these regulations will add significant complexity to our plans and programs that are not aligned with our risk profile. The result of unnecessary complexity can be a less efficient emergency response and will require more program management resources for implementation and maintenance, again, not commensurate with risks. It is difficult to see how right-sizing of the program, as noted in the scope section, is achievable.

2) The question of applicability to non-reactor sites is further compounded by section 1.3 where it states that an IAMP, as described in REGDOC 2.3.2

Accident Management: Severe Action Management Programs for Nuclear Reactors, works alongside 2.10.1 to form required defense in depth. This leads to confusion for non-reactor sites who build the principles accident management into their Emergency Management Programs.

Best regards,

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