From: Consultation
To: Belyea, Sean;
Subject: FW: EMO Comments on CNSC DRAFT REGDOC 2.10.1 - Nuclear Emergency preapredness and Response
Date: Monday, October 21, 2013 6:08:12 AM

From: Bleyer, Kathy (MCSCS) [mailto:Kathy.Bleyer@ontario.ca]
Sent: Thursday, October 17, 2013 9:59 AM
To: Consultation
Cc: Kontra, Tom (MCSCS); Nodwell, Dave (MCSCS); Beaudin, Bernie; Nguyen, Thuy
Subject: FW: EMO Comments on CNSC DRAFT REGDOC 2.10.1 - Nuclear Emergency preapredness and Response

Please find below our review of the above-noted document. Included are the excerpts which are of note, either because:

- We consider it a positive development
- We request that consideration be given to amending the section

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2. Emergency Preparedness Program

2.1 Planning basis

- The REGDOC provides Guidance on the hazards to be included in the licensee's planning basis for the Emergency Preparedness Program
- Key inclusions noted are:
  - "all credible hazards" initiated by:
    - § natural incident,
    - § accidents and malfunctions (DBA and BDBA),
    - § criminal or malicious activity including hostile actions – *This inclusion is a positive development.*
  - Full range of postulated scenarios including:
    - § Nuclear/radiological emergency combined with a conventional emergency (e.g. earthquake or forest fire)
  - A detailed analysis should be used to determine worst-case scenarios and plans developed accordingly – *there is no definition of "worst case scenario".*

Recommendation: We suggest that a definition of "worst case scenario" be included.

2.3 Emergency Response Plan and Procedures

- The Emergency Response Plan should be based on the planning basis and include RECOVERY.

2.3.3 Emergency assessment requirements

§ Requires licensee to provide regular updates to offsite authorities and the CNSC:

- assessments and predictions for both onsite and offsite conditions and parameters,
- magnitude and consequences of the emergency,
- magnitude of the offsite risk to the public and the environment – *This inclusion is a positive development.*

2.3.4 Interface and Support for offsite response organizations

- Requires licensees to:
  - formally document any arrangements and agreements with other organizations and personnel
  - Promptly and regularly provide recommendations to offsite authorities and the CNSC when protective action is required. *This information is not required in Ontario given that protective action(s) are under Provincial jurisdiction.*
  - Develop and maintain public evacuation time estimates based on current census data and future population growth on a per decade estimation until end of life – *OPG currently meets this requirement; to date, Bruce Power and CRL have not undertaken this. We see this as a positive development.*
- For NPPs:
  - Designate an onsite person with authority for nominal venting and ensure notification to offsite authorities prior to nominal venting
  - Designate an onsite person with authority for alternate venting and ensure notification to offsite authorities prior to alternate venting
  - 13. Include in each report to the CNSC, an estimate of the time at which venting will be required. - *" offsite authority" is not included here.*
  - Notify the Province and the CNSC of abnormal incidents - *"abnormal Incidents" is not defined here. Under the Provincial Nuclear Emergency Response Plan, this has a specific, defined meaning. Does this terminology have a different, CNSC definition?*

Recommendation: Suggest the addition of "offsite authority" per above.
Suggest a definition of "abnormal incidents" be included.

2.4 Preparedness

2.4.1 Training and qualification

In accordance with training and qualification, all licensees **shall:**
1. provide radiation protection training (either onsite or offsite) for offsite authorities' emergency response staff expected to assist in an emergency; training programs, for both onsite and offsite emergency responders, must be submitted to the CNSC at least 30 days prior to implementation. *It is not clear what type of training this refers to – is it only for **First** Responders?*

Recommendation: Suggest that the audience for such training be clarified.

2.4.3 Public Education program requirements

The following educational information should be made available to the public:

- Possible radiological and non-radiological hazard(s), including their short term effects as well as their potential long term effects on the public for all emergency scenarios – *how is "all emergency scenarios" determined?*
- Details of the ER plan

- Information for the public of what to expect and do during an emergency ...including:
  - Sheltering in place instructions
  - Evacuation orders
  - Activation of the public alerting systems
  - Where to get potassium iodide pills (if necessary)... *There is no reference to KI distribution* ***in advance of an emergency*** *and so this document is not in alignment with the current DRAFT CSA N1600 and thereby, the CNSC decision regarding the Pickering relicensing which states:*

    365. The Commission directs OPG to ensure the production of an emergency management public information document, to be distributed to all households in the Pickering area, summarizing the integrated emergency response plan of all involved organizations, including all key roles and responsibilities. This document should also include information on potassium iodide (KI) tablet distribution and information included in CSA Standard N1600. This document is expected to be produced by the end of June 2014.

Recommendation: *Suggest that "all emergency scenarios" be detailed/clarified.*
Suggest that the document be aligned with CSA N1600 and the CNSC relicensing decision for Pickering.

Thank you for the opportunity to review this document.
Please don't hesitate to contact me if you have any questions.

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