



**TU 06374  
PICA 13-6368**

October 18, 2013

Mr. M. Dallaire, Director General  
Regulatory Policy Directorate  
Canadian Nuclear Safety Commission  
280 Slater Street  
PO Box 1046, Station B  
Ottawa, Ontario  
K1P 5S9

Dear Mr. Dallaire:

**Subject: NB Power comments on REGDOC 2.3.2 (Accident Management)**

This purpose of this letter is to provide comments on REGDOC 2.3.2 (Reference 1). NB Power staff has reviewed the draft document, and have a number of comments on its content. Detailed comments are provided in Attachment 1. The main areas we are concerned with are:

- 1) The implication that a new set of "IAMP" documents may be required, while the new REGDOC requirements are already largely built into our existing management system documentation and may simply require revision to comply.
- 2) Suggested revisions to the definitions of Accident Management and Accident Control.
- 3) Habitability of facilities should include a provision to relocate to designated alternate facilities if required.

NB Power thanks you for the opportunity to comment on the draft document and is pleased to discuss any items that require clarification. If you require additional information, please contact **Scott Robertson** at 506-659-7651 or [srobertson@nbpower.com](mailto:srobertson@nbpower.com).

Sincerely,

*Heath Muller*  
DENO  
(for Sean Granville)

Sean Granville  
Site Vice President and Chief Nuclear Officer

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SG/SR/sr

cc. Ben Poulet, Pierre Bélanger, Lisa Love-Tedjoutomo, (CNSC - Ottawa)  
CNSC Site Office  
Al MacDonald, Claire Harris, Derek Mullin, Paul Thompson, Kathy McRae,  
Andy Hayward, Charles Hickman (NBP)

References:

1. Canadian Nuclear Safety Commission, *Accident Management*, RegDoc-2.3.2, 2013 August.

Attachments:

1. Attachment 1: NB Power comments on REGDOC 2.3.2

Attachment 1: NB Power comments on REGDOC 2.3.2

Document section/ excerpt of section	Comment	Suggested change (if applicable)	Major Comment/ request for clarification
General	The REGDOC needs to recognize the IAMPs are already built into licensees existing Management Systems Manuals (MSMs). In addition, recognition that existing programs/documents will be maintained or revised to meet this REGDOC.	Suggest renaming REGDOC “Accident Control and Management – ACM”. Include a note to the effect that programs and role titles may not be identical at each facility.	Major
General	The definition of “Accident Management” in this document is not consistent with the IAEA definition.	Suggested definition of :Accident Management”: “The taking of a set of actions during the evolution of an accident that progresses beyond the design basis to a severe accident, to prevent the further escalation of the accident, to mitigate the consequences of the accident, and to achieve a long-term safe stable state after the accident. The actions under defence in depth Level 4, using additional safety features and supporting guidelines are encompassed within accident management.”	Major
General	Accident Control requires to be similarly defined to ensure correct application of the terms in the text:	Suggested definition of “Accident Control”: The taking of a set of actions during the evolution of a design basis accident to prevent the escalation of the accident, to mitigate the consequences of the accident, and to achieve a long-term safe stable state after the accident. The actions under defence in depth Level 3, utilizing engineered safety features and accident procedures are encompassed within accident control.	Major

Attachment 1: NB Power comments on REGDOC 2.10.1 (cont'd)

Document section/ excerpt of section	Comment	Suggested change (if applicable)	Major Comment/ request for clarification
3.5 item 6	Habitability of facilities should also include an option to relocate to designated alternate facilities.	<p><b>Suggest Change:</b></p> <p>adding the following wording to the end of 3.5 sub bullet #6:                      “.... or provide alternate habitable facilities.”</p>	Major
4.1, Appendix A	Diagram in Appendix A is confusing. It would imply that Level 4&5 belong to EP program and would not fall under IAMP.	<p><b>Suggested change:</b></p> <p>Attached is a revised version of Fig 2 clarifying the relationships.</p>	Clarification
4.3.3	<p>PLGS uses the Incident Command System (ICS), as a result our Emergency Response Organization (ERO) has positions that are roughly equivalent to those listed as requiring clear roles and responsibilities:</p> <p>Emergency response manager = Incident Commander                      Nuclear Safety Manager = Planning section senior tech specialist                      Technical advisory team = Planning section</p>	Perhaps a note that role titles may not be identical at each licensee.	Clarification



