

Commission Proceedings Guide for Applicants and Intervenors Writing CNSC Commission Member Documents

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Guide for Applicants and Intervenors Writing CNSC Commission Member Documents

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Document availability

This document can be viewed on the <u>CNSC website</u>. To request a copy of the document in English or French, please contact:

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

Tel.: 613-995-5894 or 1-800-668-5284 (in Canada only)

Facsimile: 613-995-5086

Email: consultation@cnsc-ccsn.gc.ca

Website: nuclearsafety.gc.ca

Facebook: facebook.com/CanadianNuclearSafetyCommission

YouTube: youtube.com/cnscccsn

Twitter: @CNSC CCSN

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Preface

This regulatory document is part of the CNSC's Commission proceedings series of regulatory documents. The full list of regulatory document series is included at the end of this document and can also be found on the CNSC's website at nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents.

Regulatory document REGDOC-3.4.1, *Guide for Applicants and Intervenors Writing CNSC Commission Member Documents*, sets out requirements and guidance for applicants and intervenors writing CNSC Commission Member Documents (CMDs).

Requirements associated with this document are found in the <u>Canadian Nuclear Safety Commission Rules</u> of <u>Procedure</u>.

This document does not address:

- guidance on preparing licence applications
- detailed discussion about safety and control areas for particular facilities or groups of facilities
- guidance on presentation techniques

Two associated CMD templates have been developed for use in conjunction with this guide. To prepare a CMD related to a licensing decision, applicants may use the <u>External CMD Template for Licensing Decisions</u>. When preparing a CMD for a public Commission proceeding for a matter other than a licensing decision, applicants may use the <u>External CMD Template for Other Submission Types</u>. External parties including intervenors may use the latter template for any type of proceeding.

REGDOC-3.4.1 supersedes GD-379, *Guide for Applicants and Intervenors Writing CNSC Commission Member Documents*, published in March 2012.

Version 1.1 includes administrative updates to references to the Secretariat. As of January 1, 2022, the Commission Secretariat was renamed the Commission Registry and the Commission Secretary became the Commission Registrar.

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Guide for Applicants and Intervenors Writing CNSC Commission Member Documents

1. Introduction

1.1 Purpose

This document provides guidance for writing Commission Member Documents (CMDs) for submission to the Commission.

1.2 Scope

This document addresses the following aspects of writing an effective CMD:

- a brief overview of the hearing process
- guiding principles and points to remember
- writing tips (such as principles of plain language, and the use of visual aids)
- suggested format and order of information for applicants and intervenors preparing CMDs, so
 that externally submitted CMDs are in the same format as Canadian Nuclear Safety
 Commission (CNSC) staff submissions
- preparing and filing a CMD presentation

This document focuses on preparing a CMD that presents a case about a licensing application that has been made to the Commission. Section 4 of this document is specific to preparing CMDs for licensing decisions. Section 5 focuses on preparing CMDs for other types of submissions.

1.3 Background

All submissions filed with the Commission before public hearings and meetings are called Commission Member Documents. Concise, well-written CMDs help the Commission members to quickly find the information they need, which leads to a more efficient proceeding. CMDs also become part of the public record ($\underline{Canadian\ Nuclear\ Safety\ Commission\ Rules\ of\ Procedure}$, [1] paragraph 15(1)(c)).

An internal procedure was developed in 2010 to provide CNSC staff with guidance and tools to present the Commission with consistent, well-written CMDs. This procedure, which was based on years of CNSC staff experience and feedback from the Commission, included a guide for writing CMDs. Many external stakeholders showed interest in receiving similar guidance, along with a summary of the Commission hearing and meeting processes.

Development of the current document was further supported by the Commission and the CNSC Registry, to promote submission of CMD material that would provide science-based evidence and facilitate more effective communication throughout Commission proceedings.

1.4 Roles and responsibilities

It is recommended that all parties become familiar with the roles and responsibilities associated with Commission proceedings early on in the process.

Commission proceedings can involve the following contributors:

- the Commission
- the Registry
- CNSC staff
- applicants and licensees
- intervenors

1.4.1 The Commission

In keeping with the requirements of the <u>Nuclear Safety and Control Act</u> (NSCA), the Commission consists of up to seven permanent members (including the CNSC President), who are appointed by the Governor in Council. The Governor in Council may also appoint temporary members. The CNSC President is currently the Commission's only full-time member. The Commission is the decision maker and is the audience to whom CMDs are directed.

1.4.2 The Registry

The Registry is made up of CNSC employees who plan Commission business and support the President and other Commission members as appropriate.

Registry functions include:

- communicating with stakeholders, including CNSC staff, government departments, intervenors, applicants, licensees, and the public about Commission business
- receiving licence applications
- acting as the official registrar for Commission documentation
- managing Commission hearings and meetings

1.4.3 CNSC staff

CNSC staff submit CMDs to provide information and make recommendations to the Commission.

With respect to the CMD process, CNSC staff functions include:

- reviewing licence applications and submissions
- providing review results to applicants and licensees
- producing CMDs that provide the results of the application review and recommendations

1.4.4 Applicants and licensees

Applicants and licensees also submit CMDs.

An "applicant" is a party who has filed a licence application that is under regulatory review.

A "licensee" is a party who already holds a licence (but who is referred to as an applicant if making an application; for example, for licence amendment(s) or renewal(s)).

1.4.5 Intervenors

Intervenors are members of the public or organizations who have an interest or expertise in the matter who have requested the opportunity to present information on the subject of the proceeding. The request to intervene is made by notifying the Registry. The notice of public hearing and the notice of participation at a Commission meeting contain instructions on how to do this.

Where a proceeding allows for both written submissions and an oral presentation, the intervenor may choose to present both orally and in writing, or to make a written submission only. In general, an intervenor may only make an oral presentation if a written submission has been made. Rule 19 of the *Canadian Nuclear Safety Commission Rules of Procedure* [1] gives the Commission discretionary power as to whether to permit a person to participate in a proceeding.

1.5 Types of Commission proceedings

The Commission holds different types of hearings to receive and consider the information it needs to make fair, transparent decisions on the licensing of nuclear-related activities. Hearings allow for some format adjustments so that they can be as fair, efficient and informal as possible. The Commission also holds public meetings for the conduct of its affairs, at such times and places as established by the *Canadian Nuclear Safety Commission By-laws*.

Transcripts of all public proceedings are available on the CNSC website, usually the week after the hearing. All public proceedings are webcast and available at no cost on the CNSC website for three months after the close of the proceeding.

1.5.1 Meetings

Meetings consist mostly of public presentations to the Commission for information. They also may involve decisions that are not directly related to licensing of a specific facility (e.g., regulatory document approval). For more information on how to submit presentations or documents to the Commission for a meeting, please contact the Commission Registry (see subsection 1.6 for contact information).

1.5.2 Public hearings

This section presents some key information about the public hearing process, and more details are available on the <u>Public Commission hearings</u> page of the CNSC website.

At a public hearing, the applicant usually presents first, followed by CNSC staff and then the intervenor(s), if any. The sequence may differ depending on whether a one-part or two-part hearing is being held.

A public hearing is the most common process used by the Commission. Public hearings are governed by the *Canadian Nuclear Safety Commission Rules of Procedure* [1] (the Rules). The Rules state that "where the Commission holds a public hearing on any matter... it may hold the hearing on one or more days..." Where the Rules state that a public hearing can be held on one or more days, this refers to both one- and two-part public hearings (one-part hearings can take place on more than one day). This document refers to hearings as one-part public hearings (rather than one-day) and two-part public hearings (rather than two-day).

These hearings are held in public and are subject to the confidentiality of protected information (see subsection 1.5.3, Closed sessions).

One-part public hearings

One-part public hearings generally deal with less complex matters or those of limited public interest.

For a one-part public hearing, the Commission hears all of the submissions from the applicant, CNSC staff, and intervenors in a single session, with presentations being followed by questions from Commission members. A one-part public hearing can last more than one day.

Two-part public hearings

Two-part public hearings deal with more significant licensing activities (such as licence renewals, changes in technology, or removal of a key licence condition) or when the level of public interest is high.

A two-part public hearing can last more than two days, with two separate parts that are at least 60 days apart.

During Part 1 of a two-part public hearing, the Commission hears submissions from the applicant and then from CNSC staff, and then asks questions.

During Part 2 of a two-part public hearing, the applicant and CNSC staff present a brief overview of what was presented during Part 1, along with supplementary information that usually responds to questions that Commission members asked during Part 1. In some cases, the Commission members ask a first round of questions to the applicant and CNSC staff. Intervenors are then invited to present their submissions, and Commission members can ask questions after each intervenor's presentation. There is usually a final round of questions after the intervenor presentations and after all written submissions have been considered.

The applicant and CNSC staff are expected to attend both parts.

1.5.3 Closed sessions

Certain confidential information is protected (such as security information or commercially sensitive material) and may not be discussed in a public forum or otherwise made publicly available. Such information is heard *in camera*. This type of proceeding is referred to as a "closed session".

For further guidance on how a document is determined to be confidential, please refer to the *CNSC Guidance Document on Confidential Filings*. [2]

1.5.4 Criteria for recommending hearing type

Two-part public hearings have typically been conducted for licence applications and renewals, and for significant licence amendments related to nuclear facilities such as nuclear power plants and nuclear processing facilities.

The following criteria may be used to determine if a one-part public hearing is appropriate:

- the level of public interest and nature of the hearing
- the matter is not controversial
- the matter does not introduce or use new or unproven technology
- the matter would not negatively affect the function of safety-related systems
- the matter was previously examined in the context of other licensing proceedings and/or environmental assessments conducted by the Commission
- the matter is a licence renewal with no substantive amendments and no (or limited) outstanding issues

After considering the application, CNSC staff make a recommendation to the Registry as to the most appropriate type of hearing. The President, as a Panel of the Commission, decides on the hearing type.

1.6 Hearing submission process

For licensing matters, the submission process is as follows:

- 1. An application is submitted to the Registry and copied to appropriate CNSC staff significantly ahead of potential hearing dates (approximately 12 months prior). This submission may include mention of a preferred hearing date (based on the <u>calendar of public hearings and meetings</u>). For a licence renewal, the applicant identifies the expiry date of the current licence and the Registry establishes the timing for the hearing.
- 2. CNSC staff review the application and verify its completeness. If the application is complete, they perform a detailed technical review. If it is incomplete, they ask the applicant for the required information.
- 3. CNSC staff recommend to the Registry which type of hearing would be most appropriate (i.e., a one-part public hearing, a two-part public hearing, etc.), and can also recommend dates to the Registry.
- 4. The President, assisted by the Registry, determines if it will be a one-part or two-part hearing, with written submissions only or written submissions and oral presentations, and the location of the hearing.
- 5. When the type of hearing and the hearing date(s) are decided, the Registry sends a letter to the applicant along with the notice of public hearing, indicating the deadlines for filing the CMD and presentation material.
- 6. The Registry assigns a CMD number to the matter, and this number is applied to all documents associated with that matter for the given hearing. The CMD number is provided to the applicant and to CNSC staff as soon as it is assigned. Intervenors are given a CMD number when a decision is made to permit their intervention.

- 7. When the submission is received from the applicant:
 - a. If the CMD was prepared using one of the CMD templates associated with this guide, then the Registry confirms that the assigned CMD number has been applied if not, then the Registry applies the number as appropriate
 - b. If a CMD template was not used, then the Registry prepares a cover page and applies the assigned CMD number.

Note: The Commission generally places documents it receives in the course of the exercise of its quasi-judicial functions under the *Nuclear Safety and Control Act* and other legislation on the public record so that all interested parties can have equal access to those materials. That said, the Commission recognizes that some of that information may be confidential and should be protected. For further information on confidential filings, please refer to Rule 12 of the *CNSC Guidance Document on Confidential Filings*. [2]

Contact

For further information about participating in a Commission proceeding or other Commission information, please contact:

Email: interventions@cnsc-ccsn.gc.ca

Commission Registry Canadian Nuclear Safety Commission 280 Slater Street P.O. Box 1046, Station B Ottawa ON K1P 5S9

Phone: 613-996-9063 or 1-800-668-5284 (toll-free)

Fax: 613-995-5086

A <u>Public Commission Hearing Participation Request Form</u> is available for members of the public and can be submitted electronically.

1.6.1 Canadian Nuclear Safety Commission Rules of Procedure

The basic requirements for CMD submissions are set out in the *Canadian Nuclear Safety Commission Rules of Procedure*. [1] Please note that the Commission may vary or supplement any of the Rules to ensure that a proceeding is dealt with as informally and expeditiously as the circumstances and the considerations of fairness permit (subrule 3(1)).

Submissions made by applicants are subject to subrules 18(1) and 18(3), which are as follows:

- 18(1) A party who intends to appear at a public hearing shall file with the Commission, at least 30 days before the start of the hearing, a notice that includes
 - (a) a statement of the party's intention to appear and, where the party will be represented by counsel or an agent, the name, address and telephone and facsimile numbers of the counsel or agent, and
 - (b) a copy of the documentary information and written submission that the party will present to the Commission at the hearing, and a list of any witnesses proposed by the party.
- 18(3) Where a public hearing comprises two hearing days, any documentary information and written submission filed under subrule (1) or (2) shall be considered by the Commission on

each of those hearing days, and the parties and their witnesses shall attend on each of those hearing days unless the Commission directs otherwise in the interests of a fair, informal and expeditious consideration of the matter.

CNSC staff submissions are subject to subrules 2(2) and 18(2), which state that:

- 2(2) The Commission or a designated officer, as the case may be, may permit or require officers and employees of the Commission to participate in a proceeding under these Rules in such manner, including presenting information and submissions orally or in writing, questioning participants and responding to questions and submissions, as will enable the Commission or designated officer to determine the matter in a fair, informal and expeditious manner.
- 18(2) There shall be filed with the Commission, at least 30 days before the start of a public hearing, a copy of the documentary information and written submission that the officers and employees of the Commission will present to the Commission at the hearing.

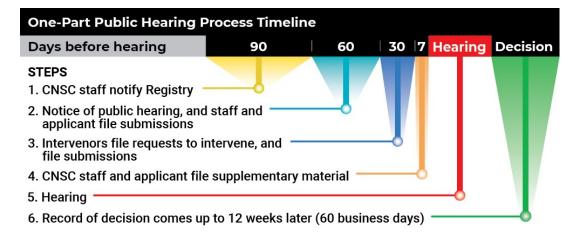
Rule 19 sets out the following stipulations for intervenor submissions:

- 19(1) Where a request to intervene at a public hearing is filed with the Commission in accordance with subrules (2) and (3), the Commission, subject to these Rules, may permit the following persons to participate as intervenors at the hearing in the manner and to the extent that the Commission considers will enable it to determine the matter before it in a fair, informal and expeditious manner:
 - (a) a person who has an interest in the matter being heard; or
 - (b) a person who has expertise in the matter or information that may be useful to the Commission in coming to a decision.
- 19(2) Where the notice of public hearing given under this Part indicates one hearing day, the request to intervene must be filed with the Commission by the filing date specified in the notice.
- 19(3) Where the notice of public hearing given under this Part indicates two hearing days, the request to intervene must be filed with the Commission at least 30 days before the second hearing day.
- 19(4) The request to intervene shall include:
 - (a) the name, address and telephone and facsimile numbers of the requester
 - (b) where the requester intends to be represented by counsel or an agent, the name, address and telephone and facsimile numbers of the counsel or agent
 - (c) a description of how the requester meets at least one of the conditions for intervening set out in subrule (1) and
 - (d) a statement setting out whether the requester wishes to intervene by way of written submission only or by way of written submission and oral presentation, and a copy of the information and submission.
- 19(5) Where a public hearing comprises two hearing days, any written submission and oral presentation of a person permitted to intervene at the public hearing shall be considered by the Commission on the second hearing day.

1.6.2 Submission timelines

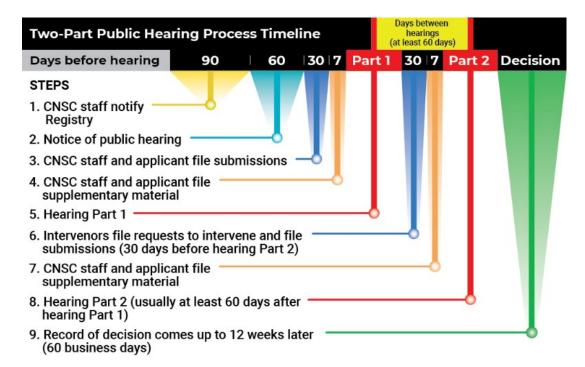
Typically, planning starts upon receipt of the application by the Commission Registrar, up to 10 to 12 months before the hearing date. The timelines for one-part and two-part public hearings following receipt of the application are described below.

Timeline for one-part public hearings



- 1. If CNSC staff recommend a one-part public hearing, then the Registry is notified at least 90 days (ideally, 120 days) before the day scheduled for that hearing. This gives the Registry the opportunity to advise the applicant of submission deadlines within a reasonable time, and to prepare the notice of public hearing within the prescribed timelines.
- 2. The notice of public hearing is issued at least 60 days (ideally, 90 days) before the hearing, or as per the deadline set by the Commission.
- 3. Submissions from CNSC staff and from the applicant are due 60 days before the hearing, or as per the deadline set by the Commission.
- 4. Submissions from intervenors are due 30 days before the hearing, or as per the deadline set by the Commission. The later deadline for intervenor submissions is to allow sufficient time for members of the public (intervenors) to read the material filed by CNSC staff and the applicant before writing their own submissions.
- 5. Any supplementary material, including slide presentations, must be filed at least seven days before the date on which it will be heard.
- 6. A decision is announced approximately 12 weeks (60 business days) after the hearing date.

Timeline for two-part public hearings



- 1. If CNSC staff recommend a two-part public hearing, then the Registry is notified at least 90 days before the day scheduled for Part 1.
- 2. The notice of public hearing is issued 60 days before Part 1.
- 3. CNSC staff and the applicant file submissions at least 30 days before Part 1, or as per the deadline set by the Commission.
- 4. CNSC staff and the applicant file supplementary material, including slide presentations, at least seven days before Part 1.
- 5. CNSC staff and applicant presentations are heard during Part 1.
- 6. Intervenors file requests to intervene, along with related submissions, at least 30 days before the date scheduled for Part 2, or as per the deadline set by the Commission. Part 2 is usually at least 60 days after Part 1, allowing intervenors to consider Part 1 submissions from the applicant and CNSC staff, Part 1 transcripts, as well as to observe Part 1 in the hearing room or via webcast.
- 7. Supplementary material that is being filed for consideration during Part 2, including presentations, must be filed at least seven days before Part 2 or as per the deadline set by the Commission. In exceptional circumstances, for example in the case that substantive information needs to be provided to the Commission for Part 2, the applicant and CNSC staff should provide supplementary CMDs at least 15 days before the intervenor's deadline (or 45 days before Part 2), to allow intervenors to provide comments on this information.
- 8. Supplementary CNSC staff and applicant submissions, as well as intervenor submissions, are heard during Part 2.
- 9. Although there are no prescribed timelines, a decision is announced approximately 12 weeks (60 business days) after Part 2.

1.6.3 Submission of Presentations

The rules pertaining to CMD presentations are addressed in Rule 21 of the *Canadian Nuclear Safety Commission Rules of Procedure*, [1] and can be summarized as follows:

- 1. During a public proceeding, the Commission may permit each participant to present information and submissions orally or in writing, and may permit participants to question one another and any witnesses and to respond to any submissions. The Commission may do so in any manner and sequence that will enable the Commission to determine the matter fairly, informally and expeditiously (usually through the Commission presiding member).
- 2. Any person who makes an oral presentation at a public proceeding must have complied with the document filing requirements set out in the appropriate rules.
- 3. Any applicants or CNSC staff members who have made submissions in the context of a public hearing may file supplementary material no later than seven days before the start of that hearing. Presentations slides are considered supplementary material; they will be given a CMD number and will be part of the public record. Although not provided for in Rule 21, the Commission may also permit the filing of supplementary submissions by intervenors.

Guidance on preparing presentations is provided in section 6, Presentations.

2. Types of Commission Member Documents

The type of CMD being prepared by applicants and CNSC staff depends on the kind of information being presented. Typically, CMDs are prepared to:

- present the Commission with information (information CMDs)
- ask the Commission to render a decision (decision CMDs)

Interventions submitted by members of the public can follow the template for information CMDs if desired. Further guidance is provided in section 5 of this document.

Depending on the sensitivity of the information being submitted, the CMD is identified as "unprotected" or clearly marked with the appropriate security classification.

Unprotected CMDs, which are the norm, contain information that is appropriate for public release. Each unprotected CMD, including the associated presentation material, becomes part of the record for the respective hearing or meeting.

Information that cannot be disclosed in public should be submitted in a CMD that is clearly marked with the appropriate security classification. This type of CMD may be presented in a closed session, and is also part of the record.

If a small portion of the submission cannot be publicly disclosed (for security or other reasons), but the rest can be made the public, then two CMDs should be submitted. In this case, the main CMD is "unprotected," and a second, confidential submission contains the confidential information.

2.1 Information Commission Member Documents

Information CMDs are used to present the Commission with such material as:

- performance reports including regulatory oversight reports
- detailed event reports
- any other matters of interest

2.2 Decision Commission Member Documents

Decision CMDs are used to ask the Commission for a decision of any type, including issuing a licence, making a regulation, or approving a regulatory document.

The CMD submitted by an applicant for Part 1 of a two-part public hearing should contain all of the information necessary for the Commission to make its decision on the licensing application. As the applicant has already filed its submissions for Part 1 of the hearing, Part 2 of the two-part public hearing allows for the applicant to supplement their submission and for consideration of the interventions. Therefore, the CMD submitted by the applicant for Part 2 of a two-part public hearing should supplement the information provided by the applicant in the Part 1 CMD. Section 2.3 discusses supplemental CMDs.

2.3 Supplemental Commission Member Documents

CMD submissions are subject to strict timelines (see subsection 1.6.2, Submission timelines). However, if one of the following conditions applies, then the original submission can be supplemented:

- a previous commitment to provide further information was made during Part 1 of a two-part public hearing
- the Commission has requested additional information
- there is new and relevant information

If there are significant or extensive changes to the original submission, then a supplemental CMD should highlight the differences between the original and the new submission.

3. Guiding Principles for Commission Member Document Preparation

An effective CMD presents information in a way that allows the Commission to consider all relevant evidentiary information that may be useful to the Commission in coming to a decision.

A CMD intended to support a licence application should provide a comprehensive science-based case for licensing. It is usually presented to the Commission at a public hearing, where Commission members direct the applicant to provide clarification as needed. At the same hearing, Commission members consider a CMD prepared by CNSC staff, which details CNSC staff conclusions and recommendations about the matter being heard as well as submissions and/or oral presentations from intervenors.

3.1 Writing tips

3.1.1 Remember the audience

The Commission is the CMD's primary audience. It is also the role of the Commission to disseminate objective scientific, technical and regulatory information to the public. In this regard, well-structured CMDs that provide scientific and technical information in clear language assist the Commission in coming to a decision, and in meeting its object of disseminating information to the public.

The CMD should contain material that allows the Commission to render an informed decision, and that all interested readers (the Commission, the public or others) can be reasonably expected to understand.

It is therefore important when preparing a CMD to keep the following principles in mind:

- communicate clearly, logically, and consistently
- convey information in plain language; where you must use specialized, technical language in order to be technically accurate, explain any unusual terms clearly within the text or define them in a glossary

3.1.2 Write with focus, clarity, logic and relevance

Focused, clear, logical and relevant information leads to clear decisions.

The Commission relies on the CMDs as the evidence for its decision, so every CMD should:

- focus on the scope of the application and the views of the participant
- contain information directly related to the hearing or meeting
- be concise, complete and clear
- present information logically and in context to facilitate easy access to the various kinds of information being conveyed
- include any information needed to assist the Commission in its consideration of the matter

A focused, clear, logical and relevant CMD is more likely to yield satisfying exchanges with the Commission than documentation that is incomplete, unclear, contains irrelevant details or lacks focus and context.

3.1.3 Use plain language

Effective communication relies on plain language. Communicating in plain language means being clear and concise, using short sentences, keeping to the facts and writing in a way that is easy to read and understand.

While the Commission depends on CMDs that are technically and legally sound, it is important to convey information in language that is as plain as possible. However, be sure not to over-simplify material, as this could alter the intended meaning or lose or compromise the message's context.

The following suggestions can help convert complex messages and legal and technical jargon into plain language that is understandable to a wide audience, without compromising the content's intent or accuracy.

Plain-language tips			
Problem	Solution		
Run-on sentences	Split run-on sentences into simpler phrases. If a sentence seems too long, focus on the key parts needed to convey the message, and divide it into two or more shorter phrases. This will help sequence ideas logically and remove unnecessary words that do not add meaning.		
	The goal is to prevent readers from having to go back and reread content that is difficult to understand before continuing.		
Ambiguous phrases	Determine what you are trying to say and change the phrase to make it clear.		
Overly wordy or redundant material	Remove words or sentences that only overstate a message or that unnecessarily repeat points that were already made.		
	As long as the message is not lost, a good rule to keep in mind when expressing complex information is that "less is more". The more simply a message can be communicated, the more impact it has and the more easily it is understood.		
Special terminology	Minimize or avoid terminology or jargon that is unfamiliar to the general public. Where possible, replace these words and phrases with simpler, more common terms.		
	Sometimes there is no simple plain-language term to explain a concept, or alternate wording may require an explanation that could complicate, change, or detract from the intended message. If you must use specialized terms in order to be technically or legally accurate, be sure to define them clearly in a glossary at the end of the main document, and then refer readers to the glossary when using the term(s) within the CMD.		
Acronyms and initialisms	An acronym is formed from the first letters of a series of words, and is a pronounceable term that can be used as a word. For example, the acronym for the Canadian Environmental Assessment Agency is "CEAA" (pronounced "seeya").		
	An initialism is formed in the same way, but the result is not pronounceable. For example, the initialism for the Canadian Nuclear Safety Commission is "CNSC."		
	Acronyms and initialisms recognized within an organization or that are familiar to technical specialists may mean nothing to other potential readers. The benefit of using them – to reduce repetition of their often lengthy full forms – is minimized if readers cannot understand the reference.		
	Spell out each acronym or initialism the first time you use it, and place it in parentheses after the spelled-out name or phrase; for example, "Canadian Nuclear Safety Commission (CNSC)." The initialism can then stand alone in subsequent occurrences.		
	Do not italicize acronyms and initialisms.		
	If you use several acronyms and initialisms in a document, define them in a glossary at the end of the CMD's main body.		

3.1.4 Italics and capitalization

Use the following guidelines for italics and capitalization:

- Apply italics only to the actual titles of acts, regulations and documents or sparingly to words that require special *emphasis*, such as direct quotations.
- Capitalize proper names and publication titles.

Examples of proper use of italics and capitalization:

- The Commission must be satisfied that all applicable requirements of the *Nuclear Safety and Control Act* are met.
- For a comprehensive overview of the CNSC, readers are invited to consult the latest version of the CNSC's *Annual Report*.

3.1.5 Provide clear and relevant information

It is often difficult to convey highly technical, complex information in clear language. It is therefore important to provide relevant technical information that will be useful to the Commission in assessing the information and in coming to a decision.

To achieve this goal, the CMD's content should focus on relevant information. The relevance of any information may be confirmed by considering if it answers a question that the Commission might reasonably be expected to ask. The information that is incorporated into the CMDs could include:

- supporting data, reports, peer reviews, analysis results, etc.
- illustrations including photos, graphs, schematics, etc.

When writing a CMD, a good way to determine the effectiveness of your document is to ask: "If I were a Commission member reading this material, what would I need to know to make an informed decision?"

3.1.6 Provide context

It is important to put the information in a CMD into context so that all readers can understand the issues easily. For example:

- When drafting content about a highly technical subject, you may be inclined to provide specialized information (such as regulatory limits or scientific formulae) to explain a situation. This kind of material should be discussed broadly in the main body of the CMD, in a way that is meaningful to all readers, with supporting details or more technical information included as addenda to the main document.
- Instead of only stating that, "...emissions are so many parts per billion (ppb)," expand on this statement with language that is more commonly understood, such as, "...the emissions are 20 percent of the regulatory limit".
- When including a unit of measurement, define the unit the first time you use it, and then use that unit consistently throughout the CMD. Consistent units and comparison points are essential to providing context. In most cases, the CNSC uses standard metric units. Participants are advised to consult with CNSC staff on appropriate units of measurement.

3.1.7 Use visual aids

When the goal is to present highly technical or complex information clearly and concisely, a picture really is worth a thousand words.

Visual aids like graphs, photographs, maps, charts and tables can be very helpful in conveying patterns, trends, site plans, locations, comparisons, etc. Diagrams can be extremely useful for presenting information about such matters as effluent discharge locations, human settlements, ground water and air monitoring stations, or exposure trends (to workers or to the public), etc. Tables, graphs and other visual aids can give the Commission valuable views of various areas of interest, such as performance over the licence period, or anticipated milestones for future plans.

When inserting visual aids, provide meaningful labels and make sure they are clear, legible, and relevant to the adjacent content.

3.1.8 Write with one voice

Plain language is best achieved by writing with one "voice". If your CMD has contributions from multiple authors, carefully review them all and adapt them as necessary to create a document with a single, cohesive style and tone.

In addition to making the document easier to read, applying a single voice helps identify and correct gaps, errors, or inconsistencies that can be introduced if input from different writers is just used exactly as received.

3.1.9 Use active voice

A document's voice or tone influences how content is heard in the reader's mind. In writing, a clear distinction is drawn between passive voice and active voice.

Passive voice usually requires more words, and creates a delay in getting to the point. The following example demonstrates the use of passive voice and active voice, respectively:

"An order was issued by the Commission to..."

"The Commission issued an order to..."

The active voice is generally considered to be more direct and concise than the passive voice, and is used to make a stronger point, whereas the passive voice is typically considered to make a weaker point.

4. Overview of the Licensing Commission Member Document

The <u>External CMD Template for Licensing Decisions</u> [3] provides placeholder headings to ensure that information is presented in the same sequence as that followed by CNSC staff in licensing CMDs. It is recommended that, where appropriate, applicants use the same sequence in their CMDs, even if the template is not used.

Content considerations for a licensing decision Commission Member Document				
Temp	plate section	Suggested content considerations		
Section #	Section name	Suggested content considerations		
	Executive Summary	Provide an executive summary that gives meaningful insight into what is being presented to the Commission, including highlights and a general explanation of the intent of the submission, as appropriate. Keep the executive summary to one page if possible, and to a maximum of two pages.		
1.0	Introduction	The subsections provided in the introduction are intended for explaining the context of the submission, including background information and a summary of the application (see below).		
1.1	Background	Provide background information that gives the context of the case for the application. The intent of this subsection is to promote the Commission's thorough understanding of matters such as a description of the facility, the applicant's activities, the site's size, location, proximity to other facilities, etc. Visual aids such as aerial photographs and maps are extremely helpful here.		
1.2	Highlights	Explain the history of the application to give the reader a sense of how long the current application process has been going on. Provide information here about such matters as: • the application's overall purpose • when the application was submitted • what is being requested • whether the applicant is requesting any high-level changes (changes to the licence period, etc.) • the licensing history		
2.0	Business Plan	Use this section to discuss the 'non-safety' factors of the application, including any business considerations or other information that gives context to the licensed activity, the facility, etc. You may want to include an overview of the key elements of the business plan over the requested licence period, discussing, for example: • factors that may cause a significant increase or decrease in productivity • potential plans for refurbishment or life extension • benefits of the proposal or activity described • the expected commercial life of the facility or activity		
3.0	Safety and Control Areas	Dedicate this section to information about the safety and control areas (SCAs) associated with the application (see section 4.1 of this guide). CNSC staff can provide guidance on which SCAs apply to a given application. Working with CNSC staff promotes alignment on specific topics between CNSC staff CMDs and the applicant's CMD.		

Content considerations for a licensing decision Commission Member Document			
Temp	plate section		
Section #	Section name	Suggested content considerations	
4.0	Other Matters of Regulatory Interest	Other matters of regulatory interest are topics about which the Commission may need information, but that do not fall within the safety and control area framework.	
		Section 4.2 of this guide provides more information about this category and the kind of information the Commission expects to see for each topic.	
		CNSC staff can provide guidance on what topics they will be covering in the CNSC staff CMD.	
	References	If applicable, provide a list of references to any material (published documents, reports, etc.) that are associated with the submission and that might be helpful, or of interest, to the reader.	
		Remember that intervenors or other members of the public may request copies of the documents listed as references in the CMD. If a referenced document is confidential, the Commission or a designated officer will determine the status of the document in accordance with section 12 of the Rules.	
	Glossary	Define acronyms, initialisms, unavoidable jargon, and special terminology.	
	Addenda	As discussed in subsection 3.1.3 of this guide, the CMD's main body should provide relatively high-level information that flows without being interrupted by large or detailed charts, graphs, analytical data, report excerpts, or other minute details.	
		If charts or graphics are small, keep them with the related text in the main body of the document. If they are large, complex, or lengthy, place them in an appropriately named addendum and refer to them from the main body. Add more addenda as appropriate.	

4.1 Safety and control areas

To facilitate consistent and comprehensive review and assessment of all regulated facilities and activities, the CNSC has organized its safety and control areas (SCAs) into a comprehensive framework. This framework consists of 14 SCAs grouped into three primary functional areas: management, facility and equipment, and core control processes.

The Commission expects any licensing CMD to address all 14 SCAs in the sequence set out in subsection 4.1.2. Therefore, each area should be included, even if only to explain why it is not relevant to the given CMD.

Performance within each SCA is rated by CNSC staff. Applicants are not expected to rate performance.

To align with the CNSC staff submission, the SCAs should be addressed in section 3.0 of the CMD.

4.1.1 Common elements for safety and control area content

In the interest of plain language and to facilitate document flow and readability, use section 3.0 of the CMD to discuss the SCAs in general, and include extensive supporting details in addenda.

The Commission expects any licensing CMD to address five common perspectives of each SCA:

- relevance and management
- past performance
- future plans
- challenges
- requests

The general expectations associated with these facets of any SCA are described below. Both the general expectations and the SCA-specific recommendations are provided within the *External CMD Template for Licensing Decisions*. [3]

Relevance and management

Submit any information that will help give the Commission a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

Past performance

Provide a high-level explanation of overall performance over the licence period – what is currently happening and how certain areas may factor more than others. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

Future plans

It is important that the Commission understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or self-assessment reports, etc.

Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made by CNSC staff.

Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.). Discuss any related transition requirements.

Provide appropriate details in addenda to maintain the flow of the document.

4.1.2 Safety and control area definitions

The following table identifies the functional areas of the SCA framework, and defines the 14 SCAs associated with those areas.

Communicate directly with CNSC staff to determine how each SCA applies to your specific facility or class of activity, and what kind of information the Commission will expect to see for each SCA.

For more complex facilities, CNSC staff may have identified specific areas within one or more SCAs.

Functional area	Safety and control area	Definition
Management	Management system	The framework that establishes the processes and programs required to ensure an organization achieves its safety objectives, continuously monitors its performance against these objectives, and fosters a healthy safety culture.
	Human performance management	The activities that enable effective human performance through the development and implementation of processes that ensure a sufficient number of licensee personnel are in all relevant job areas and have the necessary knowledge, skills, procedures and tools in place to safely carry out their duties.
	Operating performance	This includes an overall review of the conduct of the licensed activities and the activities that enable effective performance.
Facility and equipment	Safety analysis	Maintenance of the safety analysis that supports the overall safety case for the facility. Safety analysis is a systematic evaluation of the potential hazards associated with the conduct of a proposed activity or facility and considers the effectiveness of preventative measures and strategies in reducing the effects of such hazards.
	Physical design	The activities that impact the ability of structures, systems and components to meet and maintain their design basis given new information arising over time and taking changes in the external environment into account.
	Fitness for service	The activities that impact the physical condition of structures, systems and components to ensure that they remain effective over time. This area includes programs that ensure all equipment is available to perform its intended design function when called upon to do so.
Core control processes	Radiation protection	The implementation of a radiation protection program in accordance with the <i>Radiation Protection Regulations</i> . This program must ensure that contamination levels and radiation doses received by individuals are monitored and controlled, and maintained as low as reasonably achievable (ALARA).
	Conventional health and	The implementation of a program to manage workplace safety hazards and to protect personnel and equipment.

Functional area	Safety and control area	Definition
	safety	
	Environmental Protection	The programs that identify, control and monitor all releases of radioactive and hazardous substances and effects on the environment from facilities or as the result of licensed activities.
	Emergency management and fire protection	The emergency plans and emergency preparedness programs that exist for emergencies and for non-routine conditions. This area also includes any results of participation in exercises.
	Waste management	The internal waste-related programs that form part of the facility's operations up to the point where the waste is removed from the facility to a separate waste management facility. This area also covers the planning for decommissioning.
	Security	The programs required to implement and support the security requirements stipulated in the regulations, the licence, orders, or expectations for the facility or activity.
	Safeguards and non-proliferation	The programs and activities required for the successful implementation of the obligations arising from the Canada / International Atomic Energy Agency safeguards agreements, as well as all other measures arising from the <i>Treaty on the Non-Proliferation of Nuclear Weapons</i> .
	Packaging and transport	The programs that cover the safe packaging and transport of nuclear substances to and from the licensed facility.

4.2 Other matters of regulatory interest

Other matters of regulatory interest are topics that are relevant to the decision but that are not covered by the SCAs. These topics should be addressed in section 4.0 of the CMD to align with the CNSC staff submission.

CNSC staff have identified eight other matters that most often need to be addressed in external CMD submissions pertaining to licensing decisions:

- environmental assessment
- Aboriginal engagement
- other consultation
- cost recovery
- financial guarantees
- other regulatory approvals
- licensee public information program
- nuclear liability insurance

It is recommended that you address the relevant other matters in the sequence given here. Any additional matters that cannot be mapped to these topics should be included after those included in this list.

The following table explains the kind of information that should be provided for each relevant other matter.

	Content considerations for other matters of regulatory interest				
Template section					
Section #	Section name	Suggested content considerations			
4.1	Environmental assessment	All licence applications (whether for proposed new nuclear facilities or activities, or for renewals or amendments for existing facilities) are subject to an environmental assessment (EA), commensurate with the scale and complexity of the environmental risks associated with the facility or activity.			
		EAs are carried out either under the <u>Canadian Environmental</u> <u>Assessment Act, 2012</u> (an "EA under CEAA 2012") or under the <u>Nuclear Safety and Control Act</u> (an "EA under the NSCA"). Early in the process, CNSC staff determine which type of EA applies by reviewing the information provided by the applicant or licensee in their application and supporting documentation.			
4.2	Aboriginal engagement	Under section 35 of the <i>Constitution Act, 1982</i> , the CNSC has a legal duty as an agent of the Crown to consult with Aboriginal groups when contemplating conduct that may adversely impact potential or established Aboriginal or treaty rights.			
		While applicants and existing licensees do not bear the Crown's legal obligation to consult, their role in engaging Aboriginal groups is important to the efficacy of the Commission's decision-making process. The applicant's consultation activities are therefore significant and can inform and assist the consultation activities undertaken by CNSC staff.			
		The outcome of all such activities, including any accommodation measures proposed by the applicant, will also form part of the evidence presented for consideration by the Commission.			
		Therefore, if applicable, it is very important to explain any efforts that have been, are being, or will be taken to engage Aboriginal groups.			
		The CNSC's commitment and ongoing obligation to consult and build relationships with Canada's Aboriginal peoples is explained in the <u>Aboriginal consultation</u> section of the CNSC website.			
4.3	Other consultation	Describe any other consultation that has taken place, or that is taking place, with other governments or other government agencies in relation to the application.			
4.4	Cost recovery	The CNSC recovers the cost of regulating from applicants and licensees through the <u>Canadian Nuclear Safety Commission Cost</u>			

Content considerations for other matters of regulatory interest				
Template section		Supposted content considerations		
Section #	Section name	Suggested content considerations		
		Recovery Fees Regulations.		
		CMDs pertaining to licensing decisions should discuss the current standing of the licensee or facility with regard to cost recovery.		
		If the applicant is making a special request or inquiry about cost recovery, then provide the relevant content here.		
4.5	Financial guarantees	Describe the proposed or existing financial guarantee for decommissioning the licensed activity, including current status and future plans for the financial guarantee. For example, describe the instrument and the current value and future payment schedule for the related escrow account.		
		The financial guarantee should be based on a cost estimate that is developed from a CNSC-approved approach. The financial guarantee must meet CNSC expectations for liquidity, certainty of value, adequacy of value and continuity, and be a form of financial guarantee that is acceptable to the Commission.		
		For more information, refer to CNSC regulatory guides <u>G-206</u> , <u>Financial Guarantees for the Decommissioning of Licensed Activities</u> , and <u>G-219</u> , <u>Decommissioning Planning for Licensed Activities</u> .		
4.6	Other regulatory approvals	Briefly describe any other regulatory approvals or permits (federal, provincial or municipal) required for the project to proceed or continue. This information should include the status of each approval or permit being sought.		
4.7	Licensee's public information program	A public information and disclosure program is a regulatory requirement for licence applicants and licensed operators of uranium mines and mills, Class I nuclear facilities and certain Class II nuclear facilities. The documentation pertaining to the proposed public information and disclosure program(s) will therefore have been submitted with the licence application.		
		Provide a summary of the proposed program(s), including a description of the associated documentation. Information about public communication activities undertaken in pre-licensing and previous licensing stages should also be included, along with a description of the proposed public disclosure protocol for communicating information of interest to the public for routine and non-routine situations, events and activities (for further information on the public information and disclosure program please refer to CNSC regulatory document RD/GD-99.3, <i>Public Information and Disclosure</i>).		
4.8	Nuclear liability insurance	Operators of nuclear installations, as defined under the <u>Nuclear</u> <u>Liability and Compensation Act</u> , are required to have nuclear liability insurance. If nuclear liability insurance is relevant to the		

Content considerations for other matters of regulatory interest				
Tem	plate section			
Section #	Section name	Suggested content considerations		
		CMD, then state that you have it and provide applicable details.		
4.9	Additional/Other matters	If there are any additional matters of regulatory interest that have not been included above, add applicable headings at the end of the standard list of "other matters".		

5. Tips for Other Submission Types

Any external person may want to submit a CMD for a reason other than a licensing decision. The most common other types of CMDs are submitted for one of the following purposes:

- to respond to a request from the Commission
- to meet a licence condition
- to provide an update

The following considerations should be taken into account when preparing a CMD for something other than a licensing decision.

5.1 Format

The <u>External CMD Template for Other Submission Types</u> [4] is available on the CNSC website. If providing a status report, it is recommended to use the *External CMD Template for Licensing Decisions* [3], deleting the decision-related components.

This template provides a cover sheet, table of contents, and placeholders for an executive summary, an overview section, and glossary and reference pages. It also includes formatting styles that give it the same look and feel as the *External CMD Template for Licensing Decisions* [3], without the licence-specific placeholders and instructions.

5.2 Content considerations

The following table provides further information on content considerations for each of the sections provided in the *External CMD Template for Other Submission Types*. [4]

Content considerations for other submission types				
Template section		Suggested content considerations		
Section # Section name				
	Executive Summary	If the CMD is extensive, preface the main body with an executive summary that provides meaningful insight into what is being presented to the Commission.		
		If an executive summary is not desired, then delete the placeholder heading and the related page.		

Content considerations for other submission types				
Template section		Suggested content considerations		
Section #	Section name	Suggested content considerations		
1.0	Introduction	The Commission will look for an overview that provides background information and highlights, as described below.		
1.1	Background	In this subsection, explain why the CMD is being submitted. Also, be sure to demonstrate what has been done and what will be done with regard to the matter being heard.		
1.2	Highlights	Highlight any points that should be drawn to the Commission's attention. Otherwise, delete the heading and the placeholder for the subsection.		
2.0	Other Sections	The balance of the main part of this template provides placeholders that use established template styles for document layout.		
		Type over any placeholders to create personal content. Any content created using the heading styles (heading 1, heading 2, or heading 3) will be included in the table of contents when it is updated (see instructions embedded in the templates). Delete any unnecessary placeholder text.		
4.0	Conclusions	Provide any closing remarks regarding the CMD that is being submitted.		
	References	Use this placeholder page or delete it, as appropriate.		
	Glossary	Use this placeholder page or delete it, as appropriate.		
	Addenda	Use this placeholder page to create an addendum, and copy and paste it to create as many addenda as needed. If no addenda are required, then delete this page.		

6. Presentations

It is generally expected that highlights of the CMD will be captured in a slide deck for presentation to the Commission. Intervenors may also submit presentation material for consideration. The slide decks are typically created using an application such as Microsoft PowerPoint. The slide decks will be part of the public record and will be given a separate CMD number.

This presentation is an important tool for conveying a message not only to the Commission, but also to the general public. Therefore, it is important to apply adequate presentation techniques.

6.1 Length of Oral Presentations

Unless the Commission permits more time, the applicant is typically allocated between 20 to 30 minutes for an oral presentation, followed by a question period for which no time limit is ascribed.

It is the practice of the Commission to allocate 10 minutes for each intervenor's oral presentation, followed by a question period for which no time limit is ascribed.

6.2 Preparation tips

The following general parameters should be taken into account when preparing the slide presentation:

- briefly summarize the CMD, highlighting key points
- present the information in the same sequence as that used in the CMD
- number each slide for ease of reference in discussion
- ensure that each slide is legible; for example, ensure that the written information in graphs is not too crowded and is large enough to be read easily, and convey only one idea per graph
- use legible visual aids wherever possible—well-chosen pictures and graphs can be extremely effective in conveying complex information clearly and quickly
- include organizational charts and any other diagrams that will assist the Commission
- use consistent font sizes for headings and where possible for bulleted lists, ensuring that the font size throughout the presentation can be read on a large screen
- do not overload any one slide break up extensive content about a particular topic across multiple slides to maintain the presentation's overall legibility and visual effectiveness

6.3 Submission of presentation slides

The Registry must receive the presentation slides no less than seven days before the hearing date or as set out in the notice of hearing.

Email the presentation to <u>interventions@cnsc-ccsn.gc.ca</u>. If the file is too large to send by email, try converting it to PDF (one slide per page) or send it on a CD-ROM to the following address:

Commission Registry
Canadian Nuclear Safety Commission
280 Slater Street
PO Box 1046, Station B
Ottawa ON K1P 5S9

Include a list of the presenters (names and titles) and other team members who may be called upon to answer questions.

If speaking notes are prepared, provide three copies to the Commission Tribunal Officer before the start of the hearing (or the day before). The speaking notes are for the interpreters only and are not distributed to the Commission members.

Appendix A: Suggestions for Commission Member Document Formatting

Two Microsoft Word templates have been prepared to assist with CMD formatting and layout. Both templates include a cover page with placeholder instructions, a table of contents that can be updated automatically, and placeholder headings to promote inclusion of the kind of information expected by the Commission.

The placeholder headings are in place to ensure that information is presented in the same sequence as that used by CNSC staff (since May 2010).

Both templates are designed for two-sided printing.

The External CMD Template for Licensing Decisions [3] includes placeholders and instructions that are specific to CMDs being prepared to support licence requests.

The External CMD Template for Other Submission Types [4] has the same look and feel as the licensing decisions template, but provides placeholder headings and instructions that apply to other type of submissions.

Using the CMD templates

Take the following steps to use either template:

- When opening the template, save the resulting document as appropriate.
- The cover page includes highlighted instructions that can be typed over. The highlighting should disappear as it is typed over; if this does not happen, remove the highlighting manually.
- The table of contents should not be manually updated because it is pre-defined to pick up the heading styles that are already within the document. As the document is populated, these headings will move to different pages, and new headings may need to be introduced or placeholders may have to be removed.
- To update the table of contents at any time, select the first line in the table and then press F9.
- When prompted to replace the existing table of contents, click Yes.
- Instructional text is found throughout the template, in grey-shaded blocks of red text. These blocks can be deleted as the template is being filled in or as a final step.
- There are also highlighted placeholders throughout the document where appropriate content can be supplied using the predefined styles that were designed to go with the headings. As with the information requests on the cover page, (see item 2, above), the highlighting should be removed when the text is selected and typing begins. The highlighting may have to be removed manually.

Glossary

For definitions of terms used in this document, see <u>REGDOC-3.6</u>, *Glossary of CNSC Terminology*.

REGDOC-3.6 includes terms and definitions used in the <u>Nuclear Safety and Control Act</u> (NSCA), the regulations made under the NSCA, and CNSC regulatory documents and other publications. REGDOC-3.6 is provided for reference and information.

References

- Canadian Nuclear Safety Commission (CNSC), Canadian Nuclear Safety Commission Rules of Procedure, SOR-2000-211 laws-lois.justice.gc.ca/eng/regulations/SOR-2000-211/page-1.html
- 2. CNSC, Guidance Document on Confidential Filings nuclearsafety.gc.ca/eng/the-commission/pdf/guidance-document-on-confidential-filings-eng.pdf
- 3. CNSC, External CMD Template for Licensing Decisions, Ottawa, Canada nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents/index.cfm#R27
- 4. CNSC, *External CMD Template for Other Submission Types*, Ottawa, Canada nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents/index.cfm#R27

Additional Information

The following sources provide additional information about CMD preparation and attending and participating at public proceedings, along with links to various sections of the CNSC website that might provide additional insight.

- Browse hearing documents by date
- Canadian Environmental Assessment Act, 2012
- <u>CNSC subscription centre</u> (to receive notifications whenever the website is updated)
- Nuclear Safety and Control Act
- Public Commission Hearing Participation Request Form
- Calendar of public hearings and meetings
- Watch a public Commission hearing or meeting online
- For more information about intervenor submissions, visit the CNSC's <u>Participate in a public Commission hearing</u> Web page

CNSC Regulatory Document Series

Facilities and activities within the nuclear sector in Canada are regulated by the Canadian Nuclear Safety Commission (CNSC). In addition to the *Nuclear Safety and Control Act* and associated regulations, these facilities and activities may also be required to comply with other regulatory instruments such as regulatory documents or standards.

Effective April 2013, the CNSC's catalogue of existing and planned regulatory documents has been organized under three key categories and twenty-five series, as set out below. Regulatory documents produced by the CNSC fall under one of the following series:

1.0 Regulated facilities and activities

Series	1.1	Reactor	facilities

- 1.2 Class IB facilities
- 1.3 Uranium mines and mills
- 1.4 Class II facilities
- 1.5 Certification of prescribed equipment
- 1.6 Nuclear substances and radiation devices

2.0 Safety and control areas

- Series 2.1 Management system
 - 2.2 Human performance management
 - 2.3 Operating performance
 - 2.4 Safety analysis
 - 2.5 Physical design
 - 2.6 Fitness for service
 - 2.7 Radiation protection
 - 2.8 Conventional health and safety
 - 2.9 Environmental protection
 - 2.10 Emergency management and fire protection
 - 2.11 Waste management
 - 2.12 Security
 - 2.13 Safeguards and non-proliferation
 - 2.14 Packaging and transport

3.0 Other regulatory areas

- Series 3.1 Reporting requirements
 - 3.2 Public and Aboriginal engagement
 - 3.3 Financial guarantees
 - 3.4 Commission proceedings
 - 3.5 CNSC processes and practices
 - 3.6 Glossary of CNSC Terminology

Note: The regulatory document series may be adjusted periodically by the CNSC. Each regulatory document series listed above may contain multiple regulatory documents. For the latest list of regulatory documents, visit the <u>CNSC's website</u>.