



**Written submission from
Ontario Power Generation Inc.**

**Mémoire d'
Ontario Power Generation Inc.**

In the Matter of

À l'égard de

**Request for a one-time exemption to
section 26.1 of RD-204, Certification of
Persons working at Nuclear Power Plants**

**Demande visant une exemption unique à la
section 26.1 du document RD-204,
Accréditation des personnes qui travaillent
dans des centrales nucléaires**

Pickering Nuclear Generating Station

Centrale nucléaire de Pickering

Hearing in writing based on written
submissions

Audience fondée sur des mémoires

July 2019

Juillet 2019

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laissée en blanc*

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1675 Montgomery Park Road, P.O. Box 160, Pickering, Ontario L1V 2R5

May 3, 2019

~~OPG CONFIDENTIAL~~
(Redacted)

CD# NK30-CORR-00531-07831

Mr. M. A. LEBLANC
Commission Secretary

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario,
K1P 5S9

3.03.02

FILE DOSSIER	32-2-0-0
REFERRED TO REFÉRÉ A	Leblanc, M

Dear Mr. Leblanc:

Pickering NGS: Request for a One-Time Exemption to Section 26.1 of RD-204

The purpose of this letter is to request a one-time exemption to Section 26.1 of Regulatory Document RD-204, *Certification of Persons Working at Nuclear Power Plants*, for [REDACTED], a certified Authorized Nuclear Operator (ANO) at Pickering NGS.

Licence Condition 2.4 of the Pickering Nuclear Power Reactor Operating Licence (PROL) 48.00/2028 requires OPG to:

- *implement and maintain certification programs in accordance with CNSC regulatory document RD-204, Certification of Persons Working at Nuclear Power Plants.*

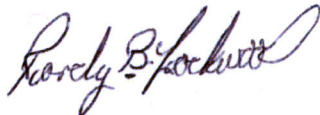
Section 26.1 of RD-204 requires that a certified Authorized Nuclear Operator (ANO), who will be applying for certification as a Control Room Shift Supervisor (CRSS), must have safely and competently performed the duties of an ANO, for a minimum of one year, immediately prior to beginning training as a CRSS.

PNGS 5-8 is currently conducting its last CRSS training program prior to the end of commercial operations. The Supplementary Station Specific phase began in April 2019. [REDACTED], who received CNSC certification on September 20, 2018 as a PNGS 5-8 ANO, applied for the CRSS training program and was selected at risk as Section 26.1 of RD-204 requirement has not been met. However, I am confident that the candidate is suitable and fully capable of progressing through the CRSS training program. The rationale is provided in Attachment 1.

Based on the information provided, OPG requests that the Commission grant a one-time exemption to Section 26.1 of RD-204 to allow the candidate to progress through the last PNGS 5-8 CRSS training program and so that, upon completion of the other requirements specified in RD-204, the candidate may eventually obtain CNSC certification as a Control Room Shift Supervisor at Pickering NGS.

OPG believes that providing this one-time exemption to Section 26.1 of RD-204 will not result in any increased risk to the environment, to the health and safety of persons, or to national security, nor will it affect the international obligations to which Canada has agreed.

If you have any questions, please contact Richard Geofroy, Director of Operations and Maintenance – Operations, at 905-839-1151, extension 5794.



Randy Lockwood
Senior Vice President
Pickering Nuclear

cc: A. Viktorov, Director, Pickering regulatory Program Division, Ottawa
L. Desaulniers, Acting Director Personnel Certification Division, Ottawa

Attachments:

1. OPG Letter, "Supporting Rationale for One-Time Exemption to Section 26.1 of RD-204".

Attachment 1 (Page 1 of 1) to OPG Letter, R. Lockwood to M. A. Leblanc, "Pickering NGS: Request for a One-Time Exemption to Section 26.1 of RD-204", CD# NK30-CORR-00531-07831

Supporting Rationale for One-Time Exemption to Section 26.1 of RD-204

Since PNGS 5-8 is currently conducting its last CRSS training program prior to the end of commercial operations, it was not possible for the candidate to meet this requirement prior to starting the program.

RD-204 Section 26.1, *Minimum Experience prior to Training*, requires that a person must have safely and competently performed the duties of a reactor operator at the NPP for a minimum of one year, immediately prior to beginning training as control room shift supervisor. However, RD-204 does not specify a minimum number of worked shifts during this one-year period.

As RD-204 also does not specify the work assignment of an ANO selected for the CRSS training program, ANOs temporarily assigned to other positions at PNGS are eligible for selection to the CRSS training program.

RD-204 Section 14.0, *Temporary Assignment to Other Positions*, allows for certified staff to maintain their certification while temporarily assigned to other positions. If assigned to an operationally focused position, the individual is required to work 3 shifts per quarter in role (12 shifts in a calendar year). If assigned to a non-operationally focused position, the individual is required to work 5 shifts per quarter (20 shifts in a calendar year).

Given these factors, the one-year requirement of RD-204 Section 26.1 does not guarantee that all entrants into the CRSS program have the same level of practical experience prior to start of training.

This candidate completed 84 shifts over the period of 7 months prior to the beginning of the CRSS training, which is significantly more than that the annual 12 or 20-shift minimum required to maintain her ANO certification.

Upon entry to the CRSS training program, all ANOs are required to meet the requirements of N-TQD-103-00001, *Nuclear Certified Personnel Continuing Training and Qualification Description*. As per Section 1.3.5 of TQD-103, such ANOs must maintain their certification and continue to gain experience in their certified role while on the CRSS training program. This requirement will be met, hence the candidate will continue to complete additional shifts to maintain her ANO certification while in training.

In addition, this candidate also meets the educational requirements for entry into the CRSS initial training specified in RD-204 Section 25.1.1, had she went directly into the CRSS program without going through the ANO program.

Based on the above and the candidate's performance as an ANO, OPG is confident that this candidate has sufficient experience to be successful in the CRSS training program.