



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

**Mémoire de
Ontario Power Generation Inc. -
Darlington**

In the Matter of

À l'égard de

**Applications from Ontario Power
Generation, New Brunswick Power
Corporation and Bruce Power to amend
their nuclear power reactor operating
licences - REGDOC-2.2.3**

**Demandes d'Ontario Power Generation, de la
Société d'Énergie du Nouveau-Brunswick et de
Bruce Power concernant la modification de
leurs permis d'exploitation d'un réacteur de
puissance – REGDOC-2.2.3**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

March 2020

March 2020

P.O. Box 4000
Bowmanville ON L1C 3Z8

Tel: 905-623-6670 ext 7030099
Fax: 905-697-7596

steve.gregoris@opg.com

OPG Proprietary

October 1, 2019

NK38-00531 P
NK38-CORR-00531-21080 P

Mr. M. Leblanc
Commission Secretary
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

**Darlington NGS – Application for Amendment of the Darlington Nuclear
Generating Station Power Reactor Operating Licence 13.01/2025**

The purpose of this letter is to request the Canadian Nuclear Safety Commission (the Commission) to amend the Darlington NGS Power Reactor Operating Licence (PROL) 13.01/2025, Licence Condition (L/C) 2.3 to replace reference to regulatory document RD-204 with its superseding regulatory document REGDOC-2.2.3.

On September 24, 2019, the Commission superseded RD-204, "*Certification of Persons Working at Nuclear Power Plants*" with regulatory document, REGDOC-2.2.3, "*Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants*".

This application is pursuant to Section 24(2) of the Nuclear Safety and Control Act and Section 6 of the General Nuclear Safety and Control Regulations.

Attachment 1 provides the amendment change to L/C 2.3 of Darlington's PROL 13.01/2025.

Attachment 2 provides information pertaining to Section 6, "*Application for Amendment, Revocation or Replacement of Licence*" of the General Nuclear Safety and Control Regulations.

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The following five OPG documents will require updates to reflect changes made in REGDOC-2.2.3:

- N-TQD-101-00001, "*Authorized Nuclear Operator Initial Training and Qualification Description*"
- N-TQD-102-00001, "*Nuclear Shift Manager/Control Room Shift Supervisor Initiation Training and Qualification Description*", and
- N-TQD-103-00001, "*Nuclear Certified Personnel Continuing Training and Qualification Description*",
- N-TQD-105-00001, "*Darlington Unit 0 Control Room Operator (CRO) Initial Training and Qualification Description*", and
- N-TQD-443-00001, "*Radiation Protection Training and Qualification*".

OPG will initiate a Regulatory Obligation Action Request (REGO) to revise the governance to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel within six months after Darlington's PROL 13.01/2025 amendment will be received.

- OPG requests the amendment of the Darlington NGS PROL 13.01/2025, as outlined in Attachments 1 and 2, and a subsequent update of LCH-PR-13.01/2025-R002, "*Licence Conditions Handbook*", at your earliest convenience.

If you have any questions, please contact Ms. Liliana Moraru, Manager (Acting), Darlington Regulatory Affairs, at (905) 623-6670, extension 0260.

Sincerely,



Steve Gregoris
Senior Vice President
Darlington Nuclear
Ontario Power Generation Inc.

Attach.

cc: K. Hazelton - CNSC (Darlington)
N. Riendeau- CNSC (Ottawa)
G. Frappier - CNSC (Ottawa)
L. Désaulniers CNSC (Ottawa)
cncs.licensee-titulaires.ccsn@canada.ca

ATTACHMENT 1

OPG letter S. Gregoris to M. Leblanc, "Darlington NGS – Application for Amendment of the Darlington Nuclear Generating Station Power Reactor Operating Licence 13.01/2025"

CD# NK38-CORR-00531-21080

Proposed Amendment to Licence Condition 2.3 of Darlington NGS PROL 13.01/2025

Prepared by: J. Cameron
Checked by: S. Dolatshahi

ATTACHMENT 1**Proposed Amendment to Licence Condition 2.3 of Darlington NGS PROL 13.01/2025****Current Wording of Darlington NGS PROL 13.01/2025, Licence Condition 2.3**

The licensee shall implement and maintain training programs for workers. The certification process and supporting examinations and tests shall be conducted in accordance with CNSC regulatory document RD-204 CERTIFICATION OF PERSONS WORKING AT NUCLEAR POWER PLANTS.

Persons appointed to the following positions require certification:

- (i) Responsible Health Physicist;
- (ii) Shift Manager;
- (iii) Control Room Shift Supervisor;
- (iv) Authorized Nuclear Operator; and
- (v) Unit 0 Control Room Operator.

OPG Requested Wording to Amend Darlington NGS PROL 13.01/2025, Licence Condition 2.3 (Changes are bolded and underlined)

The licensee shall implement and maintain training programs for workers. The certification process and supporting examinations and tests shall be conducted in accordance with CNSC regulatory document **REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF PERSONS WORKING AT NUCLEAR POWER PLANTS.**

Persons appointed to the following positions require certification:

- (i) Responsible Health Physicist;
- (ii) Shift Manager;
- (iii) Control Room Shift Supervisor;
- (iv) Authorized Nuclear Operator; and
- (v) Unit 0 Control Room Operator.

ATTACHMENT 2

OPG letter S. Gregoris to M. Leblanc, "Darlington NGS – Application for Amendment of the Darlington Nuclear Generating Station Power Reactor Operating Licence 13.01/2025"

CD# NK38-CORR-00531-21080

Information Required for Amendment of a Licence Pursuant to Section 6 of the General Nuclear Safety and Control Regulations

Prepared by: J. Cameron
Checked by: S. Dolatshahi

ATTACHMENT 2

Information Required for Amendment of a Licence Pursuant to Section 6 of the General Nuclear Safety and Control Regulations

Section 6 of "General Nuclear Safety and Control Regulation"	Applicant Information
<p>6. An application for the amendment, revocation or replacement of a licence shall contain the following information:</p>	
<p>(a) a description of the amendment, revocation or replacement and of the measures that will be taken and the methods and procedures that will be used to implement it;</p>	<p>OPG requests the Canadian Nuclear Safety Commission (the Commission) amend the Darlington NGS Power Reactor Operating Licence (PROL) 13.01/2025, in accordance with Section 24(2) of the Nuclear Safety and Control Act and Section 6 of the General Nuclear Safety and Control Regulations.</p> <p>The amendment is to replace RD-204, "Certification of Persons Working at Nuclear Power Plants" with its superseding regulatory document, REGDOC-2.2.3, "Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants". The Commission superseded RD-204 with REGDOC-2.2.3 on September 24, 2019.</p> <p>Following amendment of Darlington's PROL 13.01/2025, OPG will revise the following applicable governance to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel:</p> <ul style="list-style-type: none"> • N-TQD-101-00001, "Authorized Nuclear Operator Initial Training and Qualification Description" • N-TQD-102-00001, "Nuclear Shift Manager/Control Room Shift Supervisor Initiation Training and Qualification Description", and • N-TQD-103-00001, "Nuclear Certified Personnel Continuing Training and Qualification Description",

	<ul style="list-style-type: none"> • N-TQD-105-00001, "Darlington Unit 0 Control Room Operator (CRO) Initial Training and Qualification Description", and • N-TQD-443-00001, "Radiation Protection Training and Qualification".
<p>(b) a statement identifying the changes in the information contained in the most recent application for the licence;</p>	<p>There is no change to any of the information contained in the most recent application for the Darlington NGS licence or subsequent amendment requests (References [1] to [4]).</p>
<p>(c) a description of the nuclear substances, land, areas, buildings, structures, components, equipment and systems that will be affected by the amendment, revocation or replacement and of the manner in which they will be affected; and</p>	<p>Not applicable. This change is applicable only to the authorization training programs.</p>
<p>(d) the proposed starting date and the expected completion date of any modification encompassed by the application.</p>	<p>OPG will revise the applicable governance listed in Section 6 (a) to reflect REGDOC-2.2.3 requirements for certification of nuclear power plant personnel. A Regulatory Obligation Action Request will be initiated to track completion of this action six months after the amended PROL 13.01/2025 is received.</p>

References:

- [1] OPG letter, B. Duncan to M. Leblanc, "Darlington NGS – Application for Renewal of Darlington Nuclear Generating Station Power Reactor Operating Licence 13.00/2015", December 10, 2014, CD# NK38-CORR-00531-17137.
- [2] OPG letter, B. Duncan to M. Leblanc, "Darlington NGS – Additional Information in Support of Application for Renewal of Darlington's Power Reactor Operating Licence (PROL) 13.01/2015", January 30, 2015, CD# NK38-CORR-00531-17206.
- [3] OPG letter, B. Duncan to M. Leblanc, "Darlington NGS – Application for Darlington Nuclear Generating Station Power Reactor Operating Licence PROL 13.00/2025 Amendment", March 17, 2017, CD# NK38-CORR-00531-18350.
- [4] OPG letter, B. Duncan to M. Leblanc, "Darlington NGS – Application for Darlington Nuclear Generating Station Power Reactor Operating Licence PROL 13.01/2025 Amendment", December 5, 2018, CD# NK38-CORR-00531-20359.

Summary of Regulatory Commitments, Regulatory Obligations and Regulatory Management Actions Made/Concurrence Requested

NK38-CORR-00531-21080

Submission Title: Darlington NGS – Application for Amendment of the Darlington Nuclear Generation Station Power Reactor Operating Licence 13.01/2025

Regulatory Commitments (REGC):

No.	Description	Date to be Completed
	None	

Regulatory Management Action (REGM):

No.	Description	Date to be Completed
	None	

Regulatory Obligation Action (REGO):

No.	Description	Date to be Completed
1.	Revise N-TQD-101-00001, N-TQD-102-00001, N-TQD-103-00001, N-TQD-105-00001 and N-TQD-443-00001 to reflect the REGDOC-2.2.3 requirements for certification of nuclear power plant personnel.	Six months after amended PROL 13.01/2025 received

Concurrence Requested:

OPG requests the amendment of the Darlington NGS PROL 13.01/2025, as outlined in Attachments 1 and 2, and a subsequent update of LCH-PR-13.01/2025-R002, "*Licence Conditions Handbook*", at your earliest convenience.