



**Written submission from
New Brunswick Power**

**Mémoire de
Énergie du Nouveau-Brunswick**

In the Matter of

À l'égard de

**Application for an exemption from a
licensing requirement for the Point-Lepreau
Generating Station**

**Demande d'exemption à une exigence de
permis pour la centrale nucléaire de Point-
Lepreau**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

May 2020

Mai 2020



TU 06374

~~CLASSIFIED PROTECTED A~~
~~PERSONAL AND CONFIDENTIAL~~
Redacted

January 07, 2020

Mr. Marc Leblanc, Commission Secretary
Secretariat
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

Subject: Request to Extend the Validity Period of Certification Examinations for [REDACTED] at Point Lepreau Nuclear Generating Station (PLNGS)

The purpose of this letter is to request an extension of the validity period for Certification Generals and Specifics examinations for [REDACTED] while undertaking the Control Room Operator In Training (CROIT) program, in accordance with Licence Condition 2.3 Personnel Training of the LCH-PR-17.00/2022 R001 and as per Regulatory Document RD-204, *Certification of Persons Working at Nuclear Power Plants*, Subpart A Section 23.

As per Regulatory document – RD-204 Subpart A Section 23.3.1 on General Examinations, and 23.3.2 on Nuclear Power Plant – Specific examinations, [REDACTED] completed his exams on the dates listed below:

Generals Exam – January 30, 2015
Specifics Exam – February 26, 2016

As per RD-204 Subpart F – Section 30.0 – Extending the Validity Period of Certification Examinations, as per Section 30.1 Conditions for Extension, items 1 and 4 apply for [REDACTED] [REDACTED] co-piloting was delayed due to sickness and also required to re-take the Simulator-based training component of the certification training program. PLNGS is requesting a deviation from RD-204 Subpart F – Section 30.0 – Extending the Validity Period of Certification Examinations, Section 30.1 Conditions for Extension to meet the intent of the three year extension allowed by the new RegDoc 2.2.3 volume III Subpart F – Section 30.0 – Extending the Validity Period of Certification Examinations, as per Section 30.1 Conditions for Extension. This request for an extension of three years on each of the Generals Exam, and the Specifics Exam would establish new Validity period for [REDACTED] exams at:

.../2

Generals Exam – January 30, 2022
Specifics Exam – August 26, 2021

██████████ has completed all requirements of the certification training program, program remediation since completion of Specifics program and is currently completing 480 hours of co-piloting. PLNGS is confident that ██████████ has the knowledge and skills to safely perform the duties of a CRO despite the contravention with RD-204.

Based on the information provided, PLNGS requests that the Commission grant a onetime exemption to RD-204 Subpart F – Section 30.0 – Extending the Validity Period of Certification Examinations to allow the candidate to successfully complete the CROIT program. PLNGS believes that providing this one-time exemption 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. Please confirm the extension of the exam validity period for these examinations.

If you have any questions, please do not hesitate to contact Mr. Alan Sinclair, Operations Training Superintendent, at (506) 647-4135 or asinclair@nbpower.com.

Sincerely,



Brett Plummer
Vice President Nuclear and Chief Nuclear Officer

BP/MP/PM

cc: Louise Levert, Interventions (CNSC)
John Burta, Bruno Romanelli, Isabelle Gingras, Josée Giguère, Nathan Kline, Francois Newbury, Aya El-Merhi, Lucie Désaulniers, Cynthia Bechara (CNSC - Ottawa)
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Carol Murray, Amanda Gardner, Krista Ward, Jason Parker, Chris Wilson,
Mark Power (NBP)

Attachment:

1. Rational how ██████████ has maintained the knowledge and skills

References:

1. Letter subject “*Request to Extend the Validity Period of Certification Examinations for ██████████ at Point Lepreau Nuclear Generating Station (PLNGS)*”, dated January 12, 2018.
2. Letter subject “*Point Lepreau NGS: Extension of the Validity Period of Certification Examination for ██████████*”, dated February 25, 2019.

Attachment #1

The following is the rationale how [REDACTED] has maintained the knowledge and skills to safely perform the duties of a Control Room Operator despite exceeding the one year examination timeout on the Station Specific certification examination.

[REDACTED] was required to repeat the CROit Simulator Training Program due to receiving an unsuccessfully grade on the CROit Simulator Program Pre-Test. On April 22nd to 27th, 2019 the Simulator Certification Exam was conducted for [REDACTED] and he received a clear pass. Station Specifics knowledge must be used during the Simulator Examinations, as [REDACTED] receiving a clear pass this demonstrates he has retained Station Specifics knowledge. The CNSC has accepted that a candidate must have sufficient Station Specifics knowledge in order to successfully pass a Simulator Examination. This is a key concept that justified extending the validity period of certification examinations to three years as identified in RegDoc 2.2.3 volume III section 30.1.

[REDACTED] had a serious illness from April 29th, 2019 to October 10th, 2019. Upon his return to work [REDACTED] completed all missed Operations Continuing Training classroom and Simulator training. Please see below the Learning Management System (LMS) training records demonstrate that [REDACTED] has maintained the required continuing training for the position of Control Room Operator. Some explanation of the [REDACTED] training records is as follows;

- All simulator events are conducted to focus on maintaining current certified staff proficient with tasks as identified by the Job and Task Analysis. As [REDACTED] has successfully passed the Simulator Certification Exam on April 22nd to 27th 2019, this demonstrates his proficiency as a Control Room Operator, the Simulator Program is designed to ensure all tasks in the Job and Task Analysis are adequately performed. During operations continuing training, acceptable performance by [REDACTED] was evaluated or attended the following Simulator Core Events;
 - 97179-926a completed on 10/16/2019,
 - 97179-902 attended on 10/23/2019, and
 - 97179-927 attended on 11/12/2019.

- The following Continuing Training Classroom knowledge was completed by [REDACTED]
 - Radiation Protection Dynamic Learning Activity (97181-324) completed on 10/15/2019
 - Transmission and Distribution (97187-301R) completed on 10/17/2019
 - Knowledge continuing training components (97179-982) completed on 10/18/2019
 - Knowledge continuing training components (97179-976) completed on 10/18/2019
 - Knowledge continuing training components (97179-977) completed on 10/29/2019
 - Line of Site, Unplanned Power Changes and Fundamentals (97178-312) completed on 11/04/2019
 - Basic Radiation Protection (97181-308) completed on 11/04/2019
 - Advanced Radiation Protection (97181-306) completed on 11/04/2019
 - Work Clearance Approver for P1 (97187-505) completed on 11/05/2019
 - Intermediate Radiation Protection (97181-312) completed on 11/04/2019
 - Annual Radiation Protection Training (RPT) Refresher (97181-308) completed on 12/05/2019

- The following continuing training knowledge base evaluations were successfully completed by [REDACTED]
 - Session #4 Multiple Choice Exam (MCQ) completed on 10/23/2019
 - Session #5 Multiple Choice Exam (MCQ) completed on 10/21/2019
 - Session #6 Multiple Choice Exam (MCQ) completed on 11/15/2019

Formal training records from Learning Management System for [REDACTED]

Generated By: Cormier, Mark (MPCormier@nbpower.com) Report Generated: 01/14/2020 03:12:47 PM

Report Filters

Organizations: Point Lepreau GS
 User Groups: OPS: CONTROL ROOM OPERATOR (IT)
 Certifications: All
 Users: [REDACTED]
 Earned From Date: 10/01/2019 12:00:00 AM
 Earned To Date: 01/11/2020 11:59:59 PM

Certification: 97179-902 CORE EVENT

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
[REDACTED]	10/23/2019 12:24:31 PM		

Certification: 97179-976 CSCT CLASSROOM TRAINING BLOCK #6

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
[REDACTED]	10/18/2019 4:00:00 PM	10/16/2024 4:00:00 PM	1737

Certification: 97179-977 CSCT CLASSROOM TRAINING BLOCK #7

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
[REDACTED]	10/29/2019 12:30:00 PM	10/27/2024 12:30:00 PM	1748

Certification: 97179-982 CSCT CLASSROOM TRAINING BLOCK #12

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
[REDACTED]	10/18/2019 4:00:00 PM	10/16/2024 4:00:00 PM	1737

Certification: 97181-201 BASIC RADIATION PROTECTION (ORANGE)

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
[REDACTED]	11/4/2019 12:00:00 AM	11/2/2024 12:00:00 AM	1754

Certification: 97181-306 ADVANCED RADIATION PROTECTION (YELLOW)

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
[REDACTED]			

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
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[REDACTED]	11/4/2019 12:00:00 AM	5/4/2023 12:00:00 AM	1206
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Certification: 97181-308 ANNUAL RPT REFRESHER

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
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[REDACTED]	12/5/2019 4:00:00 PM	6/4/2021 4:00:00 PM	507
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Certification: 97181-312 INTERMEDIATE RADIATION PROTECTION (WHITE)

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
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[REDACTED]	11/4/2019 12:00:00 AM	5/4/2023 12:00:00 AM	1206
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Certification: 97181-324 DLA-RADIATION PROTECTION 2019

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
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[REDACTED]	10/15/2019 12:30:00 PM		
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Certification: 97187-301R TRANSMISSION AND DISTRIBUTION REFRESHER

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
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[REDACTED]	10/17/2019 4:00:00 PM	1/17/2022 4:00:00 PM	734
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Certification: 97187-505 WORK CLEARANCE ISSUER

Users Name	Certification Earned Date	Certification Expiry Date	Days Until Expiration
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[REDACTED]	11/5/2019 4:00:00 PM		
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