



Supplementary Information

Renseignements supplémentaires

Written submission from Bruce Power

Mémoire de Bruce Power

In the Matter of

À l'égard de

**Application for a temporary exemption
from sections 23.1.2(2) and 23.2.1 of
REGDOC-2.2.3, Personnel Certification,
Volume III: Certification of Persons
Working at Nuclear Power Plants**

**Demande visant l'exemption temporaire de
l'application des sections 23.1.2(2) et 23.2.1 du
document REGDOC-2.2.3, Accréditation du
personnel, tome III : Accréditation des
personnes qui travaillent dans des centrales
nucléaires**

Public Hearing - Hearing in writing based on
written submissions

Audience Publique - Audience fondée sur des
mémoires

June 2021

June 2021

June 17, 2021

BP-CORR-00531-01741

Mr. M. Leblanc
Commission Secretary
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Leblanc:

Bruce Power's Responses to Questions from
Commission Panel Members provided in CMD 21-H103Q

The purpose of this letter is to respond to the questions from Commission Panel Members provided in CMD 21-H103Q Table 1 as requested in Reference 1.

Bruce Power's responses are provided in Attachment A.

If you require further information or have any questions regarding this submission, please contact Jason Stevenson, Department Manager, Operations Training, at 519-361-2673 extension 12803, or jason.stevenson@brucepower.com.

Yours truly,



Maury Burton
Chief Regulatory Officer,
Bruce Power
2021.06.17 13:38:41 -04'00'

Maury Burton
Chief Regulatory Officer
Bruce Power

cc: Luc Sigouin – CNSC, Ottawa
CNSC Bruce Site Office

Attach.

Reference:

1. Letter, M. Leblanc to M. Burton, "CMD 21-H103Q - Commission Panel Questions", June 3, 2021, e-Doc 6578138, BP-CORR-00531-01734.

BP-CORR-00531-01741

Bruce Power Maury Burton, Chief Regulatory Officer
P.O. Box 1540 B10 2nd Floor E, Tiverton ON N0G 2T0
Telephone 519-361-5291
maury.burton@brucepower.com

Attachment A

**Bruce Power's Responses to Questions from Commission Panel Members
Provided in CMD 21-H103Q, Table 1**

**Attachment A:
Bruce Power's Responses to Questions from Commission Panel Members
Provided in CMD 21-H103Q, Table 1**

#	Commission Panel Question	Bruce Power Response
1	Document CMD 21-H103.1 (submission from Bruce Power) refers to Attachment A. What is this Attachment?	Attachment A is a description of the structured experience package provided in Reference A1. It is reflected in Section B.1 of CMD 21-H103.
2	How many candidates will benefit from the exemption? How many years of plant experience do they have in general?	At this time, Bruce Power has seven candidates, six former OPG Pickering Authorized Nuclear Operators (ANOs) and one former OPG Darlington ANO, that it would like to enter directly into the station systems phase of the certification program based on the request. The candidates currently employed by Bruce Power that will benefit from this exemption have approximately 11 years of plant experience at OPG Pickering and or Darlington, which includes on average approximately 3 years of experience being certified.
4	Will the temporary exemption remain valid until the next amendment of REGDOC-2.2.3 is published in 2022? Will this amendment be similar to the present temporary exemption?	Bruce Power requests that the requested exemption will remain valid until the seven candidates currently employed by Bruce Power are certified or removed from the certification program.

#	Commission Panel Question	Bruce Power Response
5	<p>Considering the facts that:</p> <ol style="list-style-type: none"> 1. the physical location of primary accessible equipment by Operations Staff differs between the Pickering CANDU 500 and the Bruce CANDU 750 Series; 2. the plant experience of the candidates at Bruce NPP is limited; 3. and a different nomenclature for systems identification is employed at Pickering and Bruce stations, <p>could the six-month reduction in plant experience at Bruce NPP pose unreasonable risk in an emergency situation?</p>	<p>The structured experience package is focused on building familiarity with the physical layout of the plant, including containment, to build a functional mental model of the station in preparation for certification training.</p> <p>All the candidates have proven operational ability, as indicated by their previous certifications. The structured experience package coupled with their previous experience is over and above a variety of scenarios that are permitted under the current regulatory framework. For instance, the requirement for 2 years Station experience prior to commencing reactor operator training is not predicated on operational experience and personnel filling roles from radiation protection to engineering could be admitted to the certification program without even approaching the level of preparation the candidates in question here possess in aggregate.</p> <p>The memorization of Uniform Subject Index (USI) numbers (device nomenclature) is not intrinsically valuable for acclimating to the station or becoming familiar with the stations systems from a functional understanding perspective prior to certification training. However, the structured experience package is focused on the execution of detailed and general operator field inspections which provide acclimation to Bruce Power's USIs and more than adequately engrains nomenclature familiarity prior to cementing them in the certification training program proper. The previously certified individuals will draw parallels between the two stations and will approach the full delivery of station systems and integrated plant operation training with a strong base and integrate their understanding of nuclear operations/systems. Furthermore, the certification training program will provide all the opportunity for a mental conversion of USIs from Pickering to Bruce Power as it pertains to certification success.</p> <p>No unreasonable risk in an emergency will be experienced at Bruce Power with the reduction in the minimum experience requirement assuming the candidates in question become certified. Passing the simulator skills CNSC examination is the ultimate test of performance to mitigate risk. The granting of certifications based on that success provides the confidence that risk is mitigated.</p>

#	Commission Panel Question	Bruce Power Response
6	Are the candidates trained to handle emergency situations specific to Bruce NPP in the 'structured learning package'?	<p>The structured learning package is designed to acclimate the candidates to the station of intended certification from both a spatial and cultural perspective.</p> <p>The package provides a logistical framework for understand the layout of the physical plant and of the operations structure.</p> <p>The ability to handle emergency situations specific to Bruce Power will be delivered in the certification training program in the Integrated Plant Operations (IPO) and simulator skills phase as it would with any other certified individual in training.</p> <p>The structured package does include field walkdowns of the stations Emergency Mitigating Procedures (EMEs). All of the components of the certification program will remain save the Generals portion, which is common among Canadian utilities and therefore portable in Bruce Power's opinion.</p>
7	Candidates are exempted from the General Certification examination. Do the candidates still have to pass other certification examinations specific to the Bruce NPP?	Yes, the candidates will be required to pass the CNSC Specifics and Simulator Skills Examinations to achieve Certification.

Reference:

A1. Letter, M. Burton to M. Leblanc, "Alternate Approach for Minimum Experience and Generals Training requirements for Personnel Certified at Ontario Power Generation hired into the Initial Certification Program at Bruce Power", November 30, 2020, e-Doc 6433624, BP-CORR-00531-00809.