



**Written submission from the  
Canadian Nuclear Association**

**Mémoire de  
l'Association nucléaire canadienne**

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**

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**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**

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Public Hearing - Hearing in writing based on  
written submissions

Audience Publique - Audience fondée sur des  
mémoires

**July 2021**

**Juillet 2021**

May 28, 2021

Canadian Nuclear Safety Commission  
c/o Louise Levert, Secretariat  
280 Slater St. PO Box 1046  
Ottawa, Ontario K1P 5S9

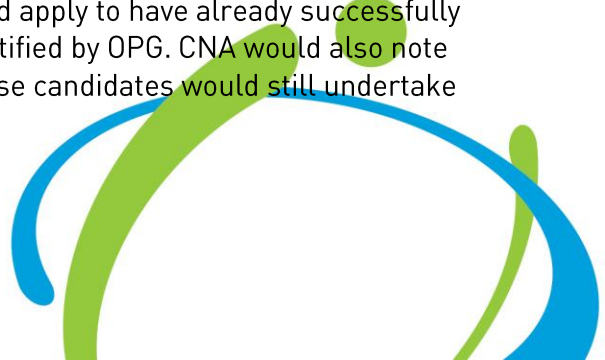
**Subject: Canadian Nuclear Association intervention in support of Bruce Power's application for a temporary exemption from sections 23.1.2 (2) and 23.2.1 of REGDOC 2.2.3, Personal Certification, Volume III: Certification of Persons Working at Nuclear Power Plants.**

The Canadian Nuclear Association (CNA) has over 120 members representing over 76,000 Canadians employed directly or indirectly in generating clean electricity, researching and producing nuclear medicine, exploring and mining uranium and promoting Canada's worldwide leadership in science and technology innovation. Our members are committed to safety throughout the entire life-cycle of the nuclear industry and as such are supportive of Bruce Power's application for a temporary exemption from sections 23.1.2 (2) and 23.2.1 of REGDOC 2.2.3.

The temporary exemption is requested to address the situation of certification of reactor operators previously certified by Ontario Power Generation and hired into the Bruce Power initial training program. This exemption is requested to require six months of additional plant experience instead of one year through the completion of a structured Learning Package. Bruce Power is also requesting an alternate approach where the General training credits obtained at an OPG NPP be considered valid at as part of the initial certification program.

The CNA believes that it is important to note that this exemption would apply to operators who have been previously certified on CANDU unit with the same basic fundamental principles as the Bruce Power units. These operators bring with them a depth of knowledge, skills and attributes that when combined with a structured Learning Package specifically designed for Bruce Power makes the six -month reduction in plant experience a safe and reasonable request that will have a neutral impact on safe operations.

It is the CNA's view that the use of an alternative approach to initial training will not cause any safety concerns for the following reason: the general training program developed from the requirements of REGDOC 2.2.3 Volume III is identical among Canadian nuclear power plant operators and that the candidates that this exemption would apply to have already successfully completed the general training and exam in order to be certified by OPG. CNA would also note that this exemption only applies to general training and these candidates would still undertake the balance of the initial training program.



For the reasons listed above, the CNA agrees with CNSC staff's assessment that the use of replacement requirements for reactor operators certified by OPG and hired into the initial certification program by Bruce Power will not pose an unreasonable risk to the environment, health and safety of persons or national security.

The CNA is pleased to support Bruce Power's application and recommends the Commission approve the application.

Sincerely,



**Steve Coupland**  
Director of Regulatory and Environmental Affairs  
Canadian Nuclear Association