



Record of Decision

DEC 24-H110

In the Matter of

Applicant Bruce Power, Ontario Power
Generation Inc., and New Brunswick
Power

Subject Application to amend four Nuclear
Power Reactor Operating Licences to
reference REGDOC-2.2.3, *Personnel
Certification, Volume III: Certification of
Reactor Facility Workers, Version 2*

Date of February 7, 2025
Decision

RECORD OF DECISION – DEC 24-H110

Applicants: Bruce Power, Ontario Power Generation Inc. and New Brunswick Power

Address/Location: **Bruce Power:** 177 Tie Road, Municipality of Kincardine, Tiverton, Ontario N0G 2T0
Ontario Power Generation Inc.: 700 University Avenue, Toronto, Ontario M5G 1X6
New Brunswick Power: 515 King Street, Fredericton, New Brunswick E3B 5G4

Purpose: Application to amend four Nuclear Power Reactor Operating Licences to reference REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers*, Version 2

Application received: **Bruce Power**, Bruce Nuclear Generating Stations A and B, February 14, 2024
Ontario Power Generation, Darlington Nuclear Generating Station, February 15, 2024
Ontario Power Generation, Pickering Nuclear Generating Station, February 15, 2024
New Brunswick Power, Point Lepreau Nuclear Generating Station, February 9, 2024

Date of decision: February 7, 2025

Panel of the Commission: P. Tremblay

Licences: Amended

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1.0 INTRODUCTION

1. Bruce Power, Ontario Power Generation Inc. (OPG) and New Brunswick Power (NB Power) (the licensees) have each submitted an application to the Canadian Nuclear Safety Commission¹ (CNSC), under subsection 24(2) of the [Nuclear Safety and Control Act](#)² (NSCA), for an amendment to their Nuclear Power Reactor Operating Licences (PROL) in respect of 4 operating nuclear generating stations (NGS): Bruce Power's [Bruce Nuclear Generating Stations \(NGS\) A and B](#); OPG's [Darlington NGS](#) and [Pickering NGS](#); and NB Power's [Point Lepreau NGS](#). The licensees have applied for an amendment to the standardized licence condition related to training and certification of personnel in their PROLs,³ by referencing CNSC regulatory document [REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2](#),⁴ which was published in October 2023.
2. Bruce Power's Bruce NGS A and B are located in Tiverton, Ontario. The Bruce site lies within the Traditional and Treaty Territory of the Saugeen Ojibway Nation (SON), and the traditional harvesting territories of the Métis Nation of Ontario (MNO) Region 7 and the Historic Saugeen Métis (HSM) peoples. Bruce Power's licence, PROL 18.03/2028, expires on September 30, 2028.
3. OPG's Darlington NGS is located in the Municipality of Clarington, Ontario. OPG's Pickering NGS is located in Pickering, Ontario. The Darlington and Pickering sites lie within the traditional lands and waters of the Michi Saagiig Anishinaabeg, the Gunshot Treaty (1787-88), the Williams Treaties (1923), and the Williams Treaties Settlement Agreement (2018). OPG's licence for the Darlington NGS, PROL 13.04/2025, expires on November 30, 2025. OPG's licence for the Pickering NGS, PROL 48.01/2028, expires on August 31, 2028.
4. NB Power's Point Lepreau NGS is located in Point Lepreau, New Brunswick. The Point Lepreau site lies within the territory covered by the Peace and Friendship Treaties with the Wolastoqey, Passamaquoddy and Mi'kmaq peoples. NB Power's licence, PROL 17.00/2032, expires on June 30, 2032.
5. The current PROLs authorize the licensees to operate their respective NGSs, with each licence including a licence condition requiring the implementation of [REGDOC 2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants](#) ("Version 1").⁵ In June 2023, the Commission accepted REGDOC-2.2.3, Volume III, Version 2 for publication and use, to replace Version 1. REGDOC-2.2.3,

¹ The *Canadian Nuclear Safety Commission* is referred to as the "CNSC" when referring to the organization and its staff in general, and as the "Commission" when referring to the tribunal component.

² S.C. 1997, c. 9.

³ Licence condition 2.4 for Bruce Power, OPG Pickering and NB Power, and licence condition 2.3 for OPG Darlington.

⁴ CNSC Regulatory Document REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Reactor Facility Workers*, Version 2, October 2023.

⁵ CNSC Regulatory Document REGDOC 2.2.3, *Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants*, September 2019.

Volume III, Version 2 was published in October 2023. The licensees are seeking licence amendments to reflect this change in their licences.

Issues

6. In considering the licensees' licence amendment application, the Commission is first required to determine whether and what requirements the [*Impact Assessment Act*](#)⁶ (IAA) imposes in relation to the activities sought to be authorized.
7. Pursuant to paragraphs 24(4)(a) and (b) of the NSCA, in considering whether to amend the licences, the Commission must be satisfied that:
 - a) licensees are qualified to carry on the activity that the amended licences would authorize; and
 - b) in carrying on that activity, licensees will make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.
8. As an agent of the Crown, the Commission recognizes its role in fulfilling the Crown's constitutional obligations, along with advancing reconciliation with Canada's Indigenous peoples. The Commission's responsibilities include the duty to consult and, where appropriate, accommodate Indigenous interests where the Crown contemplates conduct which may adversely impact potential or established Aboriginal⁷ or treaty rights.⁸ As such, the Commission must determine what engagement and consultation steps and accommodation measures are called for, respecting Indigenous interests.

Panel

9. On January 10, 2025, the Commission published [*Notice of Hearing in Writing*](#)⁹ for this matter. Due to the interconnected nature of the applications submitted by Bruce Power, OPG and NB Power, and pursuant to subsection 20(3) of the NSCA which states that "*All proceedings before the Commission shall be dealt with as informally and expeditiously as the circumstances and considerations of fairness permit...*," the Commission has decided to hear these matters in a single hearing, based on written submissions.

⁶ S.C. 2019, c. 28, s. 1.

⁷ "Aboriginal" is the term used in this document when referring to the Crown's duty to consult as that is the term used in s. 35 of the Constitution Act, 1982. In all other cases, "Indigenous" is the preferred terminology and used accordingly.

⁸ *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73; *Taku River Tlingit First Nation v. British Columbia (Project Assessment Director)*, 2004 SCC 74.

⁹ *Notice of Hearing in Writing*, CNSC, January 10, 2025.

10. Pursuant to section 22 of the NSCA, the President established himself to preside as a Panel of one Commission member to consider the applications. The Commission, in conducting a public hearing based on written materials, considered written submissions from Bruce Power ([CMD 24-H110.2](#)), OPG ([CMD 24-H110.3](#)), NB Power ([CMD 24-H110.1](#)) and CNSC staff ([CMD 24-H110](#) and [CMD 24-H110.A](#)).

2.0 DECISION

11. Based on its consideration of these matters, as described in more detail in the following sections of this *Record of Decision*, the Commission concludes that Bruce Power, OPG and NB Power satisfy the conditions of subsection 24(4) of the NSCA. Therefore,

The Commission, pursuant to section 24 of the *Nuclear Safety and Control Act*, amends the Nuclear Power Reactor Operating Licence PROL 18.03/2028 issued to Bruce Power for its Bruce Nuclear Generating Stations A and B located in Tiverton, Ontario. The amended licence, PROL 18.04/2028, remains valid until September 30, 2028.

The Commission, pursuant to section 24 of the *Nuclear Safety and Control Act*, amends the Nuclear Power Reactor Operating Licence PROL 13.04/2025 issued to Ontario Power Generation Inc. for its Darlington Nuclear Generating Station located in the Municipality of Clarington, Ontario. The amended licence, PROL 13.05/2025, remains valid until November 30, 2025.

The Commission, pursuant to section 24 of the *Nuclear Safety and Control Act*, amends the Nuclear Power Reactor Operating Licence PROL 48.01/2028 issued to Ontario Power Generation Inc. for its Pickering Nuclear Generating Station located in Pickering, Ontario. The amended licence, PROL 48.02/2028, remains valid until August 31, 2028.

The Commission, pursuant to section 24 of the *Nuclear Safety and Control Act*, amends the Nuclear Power Reactor Operating Licence PROL 17.00/2032 issued to New Brunswick Power for its Point Lepreau Nuclear Generating Station located in Point Lepreau, New Brunswick. The amended licence, PROL 17.01/2032, remains valid until June 30, 2032.

The Commission includes in the amended licences, the following amended licence conditions based on the recommendations from CNSC staff in Part 2 of CMD 24-H110:

- Bruce Power, Bruce NGS A and B, licence condition 2.4
- OPG, Darlington NGS, licence condition 2.3
- OPG, Pickering NGS, licence condition 2.4
- NB Power, Point Lepreau NGS, licence condition 2.4

For Bruce Power, Bruce NGS A and B; OPG, Pickering NGS; and NB Power, Point Lepreau NGS licence condition 2.4, the licence conditions currently include the following text:

“The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF PERSONS WORKING AT NUCLEAR POWER PLANTS.”

This text in the amended licence conditions shall be replaced with:

*“The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document **REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF REACTOR FACILITY WORKERS, VERSION 2.** Workers who began an applicable initial training program in accordance with the requirements outlined in **REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants, before January 31, 2025, may continue to be certified under requirements of this version until January 31, 2030.**”*

For OPG, Darlington NGS, licence condition 2.3, the licence condition currently includes the following text:

“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.”

This text in the amended licence condition shall be replaced with:

*“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 REACTOR FACILITY WORKERS, VERSION 2.** Workers who began an*

applicable initial training program in accordance with the requirements outlined in REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants, before January 31, 2025, may continue to be certified under requirements of this version until January 31, 2030.”

The Commission notes that the facility-specific licence conditions each include facility-specific lists of persons appointed to certain positions that require certification. In their licence amendment applications, the licensees did not request amendments to these lists and these will remain the same.

With this decision, these licensees are required by licence to conduct training and certification in accordance with REGDOC-2.2.3, Volume III, Version 2. The Commission expects licensees to update their governance documentation to reflect this amendment within six months of this decision.

3.0 ISSUES AND COMMISSION FINDINGS

12. In making its licensing decision, the Commission considered a number of relevant issues and submissions relating to the licensees’ qualification to carry out the activity the licence amendment would authorize. The Commission also considered the adequacy of the licensees’ proposed measures for preventing unreasonable risk to the environment, the health and safety of persons and national security and for compliance with international obligations to which Canada has agreed.

3.1 Applicability of the *Impact Assessment Act*

13. In coming to its decision, the Commission is first required to determine whether any requirements under the IAA apply to the application and whether an impact assessment is required.
14. Pursuant to the IAA and the [*Physical Activities Regulations*](#)¹⁰ made under it, impact assessments are to be conducted in respect of projects identified as having the greatest potential for adverse environmental effects in areas of federal jurisdiction. The proposed licence amendments do not include activities listed in the IAA *Physical Activities Regulations* that require an impact assessment or that meet the definition of a project on federal lands.

¹⁰ SOR/2019-285.

15. The Commission concludes that there is no requirement under the IAA for an impact assessment to be completed. The Commission is also satisfied that there are no other applicable requirements of the IAA to be addressed in this matter¹¹.

3.2 Assessment of the Licence Amendment Application

16. In order to be complete, a licence amendment application must meet the requirements of the NSCA, the [*General Nuclear Safety and Control Regulations*](#)¹² (GNSCR), and other applicable regulations made under the NSCA. The Commission examined the sufficiency of the licensees' applications.
17. Section 6 of the GNSCR provides that an application for the amendment of a licence shall contain:
- 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;
 - b) a statement identifying the changes in the information contained in the most recent application for the licence;
 - 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
 - d) the proposed starting date and the expected completion date of any modification encompassed by the application.
18. Section 7 of the GNSCR provides that an application for a licence or for the renewal, suspension in whole or in part, amendment, revocation or replacement of a licence may incorporate by reference any information that is included in a valid, expired or revoked licence.
19. Bruce Power (CMD 24-H110.2), OPG (CMD 24-H110.3) and NB Power (CMD 24-H110.1) each submitted an application stating how its licence amendment application satisfies the requirements of the NSCA, the GNSCR, and other applicable regulations made under the NSCA. The licensees each indicated that they conducted a gap analysis to identify the differences between the two versions of REGDOC-2.2.3, Volume III, and to determine what programs and processes needed to be modified or created. Bruce Power submitted that there is no change to any of the information contained in the most recent application for its PROL and that the proposed modification does not impact or affect any nuclear substances, land, areas, buildings, structures, components, equipment or systems. OPG submitted that five of its documents would need to be updated to reflect implementation of REGDOC-2.2.3, Volume III, Version 2. NB Power submitted that it developed an implementation plan for REGDOC-2.2.3, Volume III, Version 2. In

¹¹ The IAA can impose other requirements on federal authorities in respect of authorizing projects that are not designated as requiring an impact assessment, including projects that are to be carried out on federal lands, or projects outside of Canada. This licence amendment does not engage any such applicable IAA requirements.

¹² SOR/2000-202.

section A.2 of CMD 24-H110, CNSC staff submitted that the licensees' applications satisfied regulatory requirements.

20. The Commission concludes that the licensees' applications include the necessary information for an application for a licence amendment. The Commission finds that the licensees have provided sufficient information for the Commission to make a decision.

3.3 Licensees' Safety and Control Measures

21. The licensees are required under their respective licences to implement and maintain certification programs in accordance with CNSC regulatory document REGDOC-2.2.3. REGDOC-2.2.3 sets out requirements aiming to ensure that persons seeking a certification by the CNSC for a position referred to in the licence of a nuclear power plant are qualified to carry out the duties of that position in accordance with the NSCA and its regulations. REGDOC-2.2.3, Volume III, Version 2 was published in October 2023, replacing Version 1. The licensees are seeking licence amendments to reflect this change in their licences.
22. CNSC staff reported that the proposed key changes in the licensing requirements would include:
 - A shift to performance-based, technology-neutral requirements
 - Introduction of a unified certification scheme for all shift supervisors
 - Removal of certain training topics, aligning with REGDOC-2.2.2 *Personnel Training*, Version 2¹³
 - Alignment with the latest fitness-for-duty requirements, including drug and alcohol testing
 - Elimination of validity periods for knowledge-based certification exams
 - Adoption of a simplified, universal quarterly minimum shift requirement
 - Documentation of standardized application processes
 - Introduction of new processes to enhance efficiency, including personnel transfers
 - Addition of guidance to address longstanding regulatory interpretation issues
23. CNSC staff noted that the licensees conducted a gap analysis to identify the differences between the two versions of REGDOC-2.2.3, Volume III, and to determine what programs and processes needed to be modified or created. CNSC staff reported that Bruce Power and NB Power submitted their implementation plans in March 2024, and OPG submitted its implementation plans in April 2024. In section 1.3 of CMD 24-H110, CNSC staff reported that, on September 19, 2024, the licensees confirmed their readiness for aligned implementation, stating that REGDOC-2.2.3, Volume III, Version 2 would be fully in effect by January 31, 2025.

¹³ CNSC Regulatory Document REGDOC-2.2.2, *Personnel Training*, Version 2, December 2016.

24. In section 3.1.2 of CMD 24-H110, CNSC staff reported that the licensees had provided all requested information regarding the changes needed to address the identified gaps. The information is in CMD 24-H110.A, under references 10, 11 and 12, and includes:
- the licensees' detailed plans, which were revised to include:
 - references to REGDOC-2.2.3, Volume III, Version 2 requirements, detailing the new or modified programs and processes that need to be implemented
 - a brief description of the licensee programs and processes to be implemented or modified, along with a summary of the required changes
 - planned implementation dates for these changes
 - a copy or summary of any gap analysis conducted to identify the changes needed for full compliance with REGDOC-2.2.3, Volume III Version 2.
25. The Commission is satisfied that the licensees have appropriate measures in place to implement REGDOC-2.2.3, Volume III, Version 2. The Commission is further satisfied that licensees have confirmed their readiness to implement REGDOC-2.2.3, Volume III, Version 2 by January 31, 2025.
26. Based on its analysis of the information provided and discussed above, the Commission is satisfied that the licensees are qualified to carry on the licensed activities that the amended licence would authorize. In addition, the Commission finds that the licensees have adequate programs and measures in place to ensure that the health and safety of workers, the public and the environment will be protected. The Commission further concludes that the licensees have adequate measures in place to provide for the maintenance of national security and to implement international obligations to which Canada has agreed.

3.4 Indigenous Engagement and Consultation

27. The Commission considered the information provided by CNSC staff and the licensees regarding Indigenous consultation and engagement activities in respect of this licence amendment application. Indigenous consultation refers to the common law duty to consult with Indigenous Nations and communities flowing from section 35 of the [Constitution Act, 1982](#).¹⁴
28. The common law duty to consult with Indigenous Nations and communities is engaged when the Crown contemplates action that may adversely affect established or potential Aboriginal and/or treaty rights. The CNSC, as an agent of the Crown and as Canada's nuclear regulator, recognizes and understands the importance of building relationships and engaging with Canada's Indigenous Nations and communities. The CNSC ensures that its licensing decisions under the NSCA uphold the honour of the Crown and consider potential impacts to claimed or established Aboriginal and/or treaty rights pursuant to section 35 of the *Constitution Act, 1982*.

¹⁴ Schedule B to the *Canada Act, 1982* (UK), 1982, c 11.

29. The duty to consult is engaged wherever the Crown has “knowledge, real or constructive, of the potential existence of an Aboriginal right or title and contemplates conduct that might adversely affect it”¹⁵. Licensing decisions of the Commission, where Indigenous interests may be adversely impacted, can engage the duty to consult. The Commission must be satisfied that it has met the duty prior to making the relevant licensing decision.
30. The proposed licence amendment to require that licensees implement REGDOC 2.2.3 Volume III, Version 2 does not include any new licensed activities that could cause new impacts on the environment or changes in the ongoing licensed activities at the NGSs, and therefore, will not cause any new adverse impacts to any potential or established Indigenous and/or treaty rights. As such, the Commission’s responsibility to uphold the honour of the Crown and its constitutional obligations with regard to engagement and the duty to consult respecting Indigenous interests have been satisfied.

3.5 Licence Amendment

31. The licensees applied to include REGDOC-2.2.3, Volume III, Version 2 in their licences, under licence condition 2.4 for Bruce Power, OPG’s Pickering NGS, and NB Power; and under licence condition 2.3 for OPG’s Darlington NGS. The specific positions requiring certified workers are listed in the applicable PROs. In their licence amendment applications, the licensees did not request amendments to these lists.
32. In Part 2 of CMD 24-H110, CNSC staff submitted proposed amendments to the respective licences. CNSC staff noted that, over time, the licensees adopted different names for the positions designated for CNSC certification. Consequently, the actual titles of the designated positions at power reactor facilities vary depending on the licensee and facility. CNSC staff explained that REGDOC-2.2.3 Volume III establishes a generic terminology, regrouping designated positions of equivalent type and associating the generic positions with the actual, site-specific positions. To ensure the designated positions are staffed with duly certified workers, it is important for the licence conditions to designate the correct positions in accordance with REGDOC-2.2.3 Volume III.
33. CNSC staff further submitted that some power reactor employees who will be presented for certification in the next three to five years may have been selected and trained under different or both versions of REGDOC-2.2.3 Volume III. CNSC staff recommended that candidates who obtained qualifications under Version 1 be recognized as compliant under REGDOC-2.2.3, Volume III, Version 2. CNSC staff proposed the licence condition be amended to state that workers who began an applicable initial training program in accordance with the requirements outlined in REGDOC-2.2.3, *Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants*, before January 31, 2025, may continue to be certified under requirements of this version until January 31, 2030.

¹⁵ *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73 at para 35.

34. For Bruce Power, Bruce NGS A and B; OPG, Pickering NGS; and NB Power, Point Lepreau NGS licence condition 2.4, CNSC staff proposed that the current text:

“The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF PERSONS WORKING AT NUCLEAR POWER PLANTS.”

be replaced with:

*“The licensee shall implement and maintain certification programs in accordance with CNSC regulatory document **REGDOC-2.2.3, PERSONNEL CERTIFICATION, VOLUME III: CERTIFICATION OF REACTOR FACILITY WORKERS, VERSION 2**. Workers who began an applicable initial training program in accordance with the requirements outlined in REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants, before January 31, 2025, may continue to be certified under requirements of this version until January 31, 2030.”*

35. For OPG, Darlington NGS, licence condition 2.3, CNSC staff proposed that the current text:

“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.”

be replaced with:

*“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 REACTOR FACILITY WORKERS, VERSION 2**. Workers who began an applicable initial training program in accordance with the requirements outlined in REGDOC-2.2.3, Personnel Certification, Volume III: Certification of Persons Working at Nuclear Power Plants, before January 31, 2025, may continue to be certified under requirements of this version until January 31, 2030.”*

36. The Commission accepts the proposed licence amendments as submitted by CNSC staff in Part 2 of CMD 24-H110. The Commission notes that the facility-specific licence conditions each include facility-specific lists of persons appointed to certain positions that require certification. In their licence amendment applications, the licensees did not request amendments to these lists, and these will remain the same.
37. The Commission anticipates that CNSC staff will modify the four licence conditions handbooks associated with the amended PROLs to reflect the implementation of REGDOC-2.2.3, Volume III, Version 2 as soon as possible. The Commission notes, however, that the amended licence conditions are effective as of the date of this decision.

4.0 CONCLUSION

38. The Commission has considered the licence amendment applications submitted by Bruce Power, OPG and NB Power, as well as the information submitted by CNSC staff, as set out in the material available for reference on the record. Based on its consideration of the information submitted, the Commission, pursuant to section 24 of the NSCA, amends the Nuclear Power Reactor Operating Licences issued to:
- Bruce Power, Bruce NGS A and B
 - OPG, Pickering NGS
 - OPG, Darlington NGS
 - NB Power, Point Lepreau NGS
39. With this decision, the amended licence conditions require the implementation of REGDOC-2.2.3, Volume III, Version 2. The Commission anticipates that CNSC staff will modify the four LCHs associated with the amended licences to reflect the implementation of REGDOC-2.2.3, Volume III, Version 2, as soon as possible.

Tremblay,
Pierre

Digitally signed by Tremblay, Pierre
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February 7, 2025

Pierre Tremblay
President

Date