| **#** | **Page # /**  **Section** | **Commenter** | **Issue** | **Suggested Change** | | | **MAJOR** or  **Clarification** | | **Impact** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **General** | Bruce Power,  CNA, OPG, NB Power | The nuclear power plant facilities (Industry) appreciate the opportunity to provide feedback on this important document, which impacts the effectiveness and timeliness of the training programs for certifying workers at nuclear power plants. We further recognize the many improvements this version already incorporates from the past versions, of note: better definition of information required for application for certification and renewal of certification; direction on requirements for certified staff transferring to other facilities; validity periods and sequencing of written/simulator examinations removed/extended; revised certification of SM to a licensee managed qualification; and revised lists of station specific topic areas to guidance, allowing licensees to fully implement Systematic-Approach-to-Training (SAT) based training programs.  Given this, ensuring this version of the REGDOC’s structure, requirements and guidance are as clear as possible will avoid confusion on expectations, internal churn and the potential for errors during implementation. The intent of our feedback is to share the practical challenges of applying the proposed text as currently written. The majority of our comments focus on improving the clarity of the final document, while a few of the comments identify inconsistencies or conflicts with other REGDOCs, CNSC guidance, or Industry best practices.  Following a collective review by personnel with extensive experience developing SAT based programs, licensees have identified several areas where misunderstanding may be possible and detailed them in this table of comments. To ensure the intent and impacts of these proposals are fully understood, Industry requests the CNSC host a workshop with all impacted stakeholders before this draft is revised and submitted to the Commission for approval. Licensees suggest the following topics for discussion:   1. **Presence of subjective or ambiguous wording or wording repetitive of or inconsistent with other REGDOCs**    * Causes regulatory uncertainty and may lead to inconsistent implementation amongst industry.    * To the extent possible, the wording of the REGDOC should be explicit and not be susceptible to subjective interpretation.    * Confusion on, or misinterpretation of, the REGDOC expectations between Industry and CNSC staff will create additional, possibly excessive, discussions to address this uncertainty. 2. **Over-prescription of requirements**    * By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. 3. **Applicability to and/or ability to implement at new facilities**    * Many of the requirements are based on roles, responsibilities, and functions at a CANDU facility, which may or may not be transferable to future nuclear power facilities. 4. **Oversight of contracting out**    * Contractor oversight is governed by other management system processes and should not be included in this REGDOC.    * Inclusion may result in a reduction in safety due to delays in conduct of training programs.   Lastly, Industry highlights and reiterates the following request for clarification:   * CNSC will consider for inclusion in the next revision, the ability for licensees to conduct science fundamentals and equipment principles training prior to commencing the initial certification training program. * In October 2021, Industry recommended the CNSC allow the licensees to conduct science fundamentals, equipment principles prior to commencing the initial certification training program, and the requirement to conduct a separate general examination be removed. | | | | | | |
|  | **General** | GE-Hitachi Nuclear Energy | GEH staff acknowledge the specific modifications proposed by CNSC staff to Draft REGDOC2.2.3 Personnel Certification, Volume III: Certification of Reactor Facility Workers, Version 2 to facilitate the incorporation of Small Modular Reactors (SMRs) into certification programs within the Canadian regulatory framework.  The Version 2 document layout and the inclusion of the Guidance notes provide a substantial improvement in basis and clarity of the requirements. GEH appreciates the opportunity to provide comments on the draft REGDOC-2.2.3 Vol III, Version 2.  GEH staff have noted that language in certain sections of the draft REGDOC-2.2.3 remain restrictive and may hinder the timely certification of personnel required to support the commissioning of SMRs in Canada, including deployment of the first BWRX-300.  While aspects of GEH staff’s concerns with the certification requirements may also be addressed under REGDOC-1.1.2, Licence Application Guide: Licence to Construct A Reactor Facility, GEH as the Plant Designer and Original Equipment Manufacturer is not the licensee for the Darlington New Nuclear Project (DNNP), but is responsible for the analysis, design and development of the BWRX-300 training programs for key plant personnel | |  |  | |  | |
|  | General comment | GE-Hitachi Nuclear Energy | While Revision 2 does offer a degree of flexibility in demonstrating compliance with CSNC Regulatory Requirements and opens the door to other than CANDU Nuclear Power Plants there are many areas of the current draft where the legacy of the CANDU related requirements persists, and sufficient provision is not provided for Small Modular Reactors and the unique characteristics of certifying workers for new First-of-a-Kind (FOAK) reactor designs. | | Global solution is one, the inclusion of “or an approved alternative” for either each major section or in an opening preamble to cover all future non CANDU reactor designs. And two, guidance language must be included that outlines the foundational principle(s) which support the specific requirement and how these principles can be applied in a proportional manner to all future non-CANDU reactor designs. |  | |  | |
|  | Section 3.1 Permitted Employment Guidance, Certificate Transferability language applies to single or multi-unit plants at a site/facility | GE-Hitachi Nuclear Energy | This section does not provide specific language to cover multiple single separate reactor unit plants at the same site, i.e., two or more identical Small Modular Reactors located at the same site and operated by a single licensee. | | Consider incorporating a “fleet or type” related certification tied to the reactor design. |  | |  | |
|  | Section 5.2.4 (e) and Appendix B Sub-subsection 9.1.119.1.11 – 360 hours of Work Under Supervision (WUS) being an existing CANDU criteria is related to the complexity of the plant. | GE-Hitachi Nuclear Energy | Two issues:  One, for Small Modular Reactors this must be scalable based upon plant complexity and factoring in the presence of passive safety systems and hence the complexity of the specific role. Two, no allowance for alternatives when plant commissioning is taking place, not possible to perform WUS until after plant is in service. | | Accommodation required for “Cold License Class(es) vs Hot License Classes” and scalability need to be included for this requirement. |  | |  | |
|  | Appendix B Sub-subsection 18.2.1 – 4 shifts/48hrs per quarter is anincrease from Rev 1 Section 14.1.1 and 3 shifts per quarter with 50 over 3 years. | GE-Hitachi Nuclear Energy | Two issues:  One, again the number of shifts was based upon CANDU technology and therefore linked to plant/job complexity and the recency effect, and this again does not factor in the reduced complexity and passive safety systems of SMRs. Two, this provides less flexibility for individuals/organizations while only simplifying compliance monitoring by the CNSC. | | Proportionality and scalability need to be included for this requirement. |  | |  | |
|  | Section 9.1.6 On-the job Training addresses OJT but Sections 9.1.10 Performance-based Certification Examination / Section 9.3.3 Performance-based Requalification Testing / Section 9.5.4 Performance based Certification Examination only mentions Full-Scope Simulator Examination or an “approved alternative” but no definition of what the scope of “approved alternative acceptable to the CNSC” may encompass (Section 21). | GE-Hitachi Nuclear Energy | BWRX-300 SMR requires the adoption of “Licensing/Certification Job Performance Measure” for safety critical tasks that are discrete and insufficient in and of themselves to construct a dynamic simulator-based evaluation event. Given the level of plant automation and passive safety systems inherent in the BWRX-300 SMR the design of the Initial and Recertification Examinations will have to be substantially different. Note also that there is currently no flexibility or provision for alternative evaluation methodologies for SMRs in either CNSC Exam Guide 1 or Exam Guide 2 (REGDOC 2.2.3 Vol IV draft). | | Formal mechanism required for SMR Initial Certification Examinations that meets the intent of the performance-based requirements but accommodates the differences in plant design and role duties for the BWRX-300 SMR. A possible venue is a BWRX-300 specific CNSC TECDOC. |  | |  | |
|  | Current document in locked in multi-unit or multi-role certification model from large CANDU plants – Section 9.1 Core Qualifications for Operations Personnel vs Section 9.2 Supplementary Qualifications for Shift Supervisors and Section 3.2 Employment Status Guidance Multiple Certifications. Section 4 The Designated Positions, Section 4.2 Designated Position Staffing, Section 9 Operations Personnel Certification and Section 13.1 Initial Training Programs and Section 13.2 Continuing Training Programs separate the shift supervisor and reactor operator certifications and require “distinct XXX training programs”. | GE-Hitachi Nuclear Energy | For the BWRX-300 SMRs there will be a single Control Room Certification Program for the Shift Supervisors and Control Room Operators thus furthering the safety goal that either one can act in any required role in an emergency. Which role an individual will fill on a particular shift should not require a unique specific or multiple certification(s) – Lead vs Right Hand and Left Hand Assisting Authorized Nuclear Operators, Lead vs Assisting Unit 0 Control Room Operators. This concept has been recognized by the CNSC via the new language addressing Control Room Shift Supervisors and Shift Managers at multi-unit CANDU plants including the issuance of multiple certifications. | | Multiple possible solutions including; single Control Room Certification for both Control Room Operators and Shift Supervisors, only certifying the Control Room Operators with Shift Supervisors maintaining a Control Room Operator Certification, or issuing Multiple Certifications to individuals for both positions. |  | |  | |
|  | Section 10.1.3 Prior Work Experience (Health Physicist), Section 12.1 Personnel Selection Program Requirements (Prior Work Experience) and Section 12.2.1 (c) Work Experience are all problematic for “Cold Start Up” of the first BWRX-300 Unit in Canada. | GE-Hitachi Nuclear Energy | Not feasible to meet these prior work experience requirements for the “First-of-a-Kind” Plant Design. | | Require accommodation for “First of Kind” Plant Design and Commissioning of First Unit for any NPP Licensee. |  | |  | |
|  | Section 14.1 (a) separation between Trainers and Examiners is too restrictive for a First-of-a-Kind (FOAK) reactor design and associated certification training program. | GE-Hitachi Nuclear Energy | This requirement is appropriate only for a mature plant design with a full complement of training and examination staff. | | For new plants the previous standard of prohibiting trainer/examiner contact with students once the examination development is initiated. is more appropriate and this flexibility must be reflected in the requirements. |  | |  | |
|  | **General** | Froats and Froats Associates | This document provides thoughts and input in response to the request from Brian Torrie in May 2022. The request asked to provide some independent thought / perspective for consideration as the CNSC works to evolve the REGDOC-2.2.3 governing the certification of licenced positions for Class IA nuclear facilities in Canada. Context of the Review In conducting the review, no discussion was initiated with any of the licencees. The request was to provide some independent perspective. The thoughts and comments that follow are solely based on the experience of John Froats plus a consultation with four university educators on examination methods and perspectives on the subject of licenced staff.  In the briefing for this review, the objectives driving the changes were stated to be:  • To address opportunities to reduce barriers to access to the licenced roles  To prepare for the application in the context of SMR's  The stated intent of reducing barriers to access to licenced roles was shared as a positive objective by all. It is important to emphasize that all in this review were very quick to say as long as the high standard of competency in these roles is maintained. Definition and Control Of Knowledge, Skill and Attitudinal Aspects (Competency) As an overarching comment, there are many ways to evaluate and check competency. Basing the confirmatory processes on a rigorous SAT assessment process is a sound approach. However, if there are knowledge, skill or attitudinal (cultural) elements omitted from the defined content requirements then any assessment process fails. It would seem prudent that considerable thought be given to how the  CNSC is going to exert oversight and Regulatory control (authority) over the definition of the competency requirements that need to be met. Some form of approval / change control process would seem needed / prudent.  I was licenced as a shift supervisor (albeit many years ago) and was able to meet the requirements over a 2-year period of very intensive learning and experience. Requirements and roles have changed / evolved since that time in very significant ways — so of course the knowledge and skills (competency) requirements has evolved as the roles changed.  The thinking has changed considerably with respect to the adherence to procedures and procedures have improved dramatically. Over the same period, we have had events that resulted in the emergence of a focus on beyond design basis events. While some procedural guidance can be provided for these kinds Of situations, experience to date suggests that response will require ability to apply knowledge (including science fundamental knowledge and knowledge of plant physical layout) to successfully manage the challenges at the Level 4 defence in depth response level and in beyond design base events. There is relevant OPEX from events like the 2003 blackout that provide 'food for thought' on this aspect of knowledge and skill requirements.  So, while the document provides a high-level list of Station Specific knowledge requirements in Appendix Delta, it does not provide any similar guidance for the 'general knowledge requirements' — the subject of the most substantive change in approach. This may be deliberate, leaving the discussion of required competency base knowledge to some other process. It just strikes me as an independent reviewer to be an inconsistency that warrants reflection.  So as an independent reviewer, I'd have to summarize my overall conclusion as that without any detail of the definition of specifics of required content, control of content definition and change control at the front end, or without understanding of the CNSC approach to independent oversight to ensure front end definition is correct and that confirmation of adequacy of implementation (the back end) is effectively done, all I can say is that the changes could work if correctly implemented and controlled. Preparation for SMR's In looking at the document with the lens of application to SMR's, most of the document is at a high enough level that it could be applied to any technology. Of course, the Appendix Alpha would need to be updated to include whatever structure merges for the SMR. The application to SMR will very much depend on the SAT based evaluation of what the knowledge requirements are for new machines.  The only other place in the document that may warrant reflection is section 3.1. In section 3.1, it explicitly requires a unique licence for each site (not transferrable). I have ben of the view for some time that to make the vision of SMR's economically feasible, industry will need to deploy series of 'identical' machines. If a machine in Ontario was 'identical' to a machine in Saskatchewan for example, then just like a pilot gets certified to fly a specific aircraft, we might envision a transferable licence between facilities as long as the facilities are 'identical'.  A Few Specific Observations  1. In the draft, safety culture is listed in Appendix Charlie 2 as a requirement for being a licensed Health Physicist but is not mentioned anywhere in the context of a requirements for the other licensed positions.  2. In discussions with academic colleagues about methods to confirm student comprehension there was general consensus that:   * 1. Multiple choice questions can be effective in confirming specific details of required knowledge.   2. Multiple choice questions are less effective at confirming ability to diagnose or apply specific knowledge.  1. There was general agreement that the longer the time interval between the study of a subject and the application of the subject knowledge the more likely the recollection of the knowledge has diminished. The relaxation of time limits for EDI concerns has merit, but success will be dependent on the processes to confirm knowledge retention — particularly after an absence for any reason. 2. During the discussion with academic colleagues, all expressed the importance of being able to explain to the public how independent regulatory oversight would remain effective in providing public assurance / confidence that licensed personnel have the required competency (knowledge, skills and attitude) in whatever scheme is being used. It is clear that there are both societal drivers (EDI) and huge cost and production drivers that would tend to drive toward reducing requirements. As is often quoted 'safety must remain the overriding requirement'. One thought was that there may be an opportunity to blend in some kind of 3rd party review process to the change control process of defining required content and/or evaluation of conformance to requirements. | |  |  | |  | |
|  | **Entire Document** | Bruce Power,  CNA, OPG, NB Power | Title change from “*Certification of Persons Working at Nuclear Power Plants*” to “*Certification of Reactor Facility Workers*” will require document revisions of licensees’ documentation, such as training materials where this may be the only update required. | Return title to “Certification of Persons Working at Nuclear Power Plants”. | | | **MAJOR** | | This is an administrative burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Several sections**  **9.1.11 & Guidance, 12.4.1 & Guidance, 13.3, 18.2.1, & Guidance, 20, 21, App B** | Bruce Power,  CNA, OPG, NB Power | Use of the words” acceptable *to the CNSC*” | Replace “acceptable to the CNSC”  For example; change:  *“acceptable to the CNSC”*  to:  *“accepted as part of the licensing basis”* | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Several sections**  **5.3.3, 5.4.3, 5.4.4, 5.5.3, 5.5.4, 10.1.2, 12, 12.1, 13.2.1, 13.2.2, 13.2.3, 14.5, 17.1, 18.5, 18.5.1, 18.5.2, 18.5.3, 18.6, App D** | Bruce Power,  CNA, OPG, NB Power | Use of the word “suitable” | Remove the word “suitable”. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 11**  **1.3 (c)** | Bruce Power,  CNA, OPG, NB Power | List of *Class I Nuclear Facilities Regulations* sections being referenced does not include 13(2), which deals with certification decision notifications. | Add a reference to section 13(2). | | | Clarification | |  |
|  | **Page 13**  **Section 2** | Bruce Power,  CNA, OPG, NB Power | CNSC cannot mandate that workers **MUST** apply for renewal of certification, if the person or licensee does not want to.  Certified workers DO NOT apply for certification, a licensee does. | Consequently, applicants seeking certification renewal should apply for the renewal of certified worker's ~~their~~ certification(s) before the expiry date specified on their certificate(s). | | | **MAJOR** | | REGDOC must comply with Class I Facilities Regulations.  Regulatory uncertainty due to the inconsistency with the Class I Facilities Regulations. |
|  | **Page 13**  **Section 3.1 Guidance** | Bruce Power,  CNA, OPG, NB Power | In this document, employee-employer relationship should be limited to certified staff. | The licensee is responsible for the competency of all certified workers employed at the reactor facility identified in the licence, regardless of the contractual agreement binding certified workers and the licensee as employer. | | | Clarification | |  |
|  | **Page 13**  **Section 3.1 Guidance** | Bruce Power,  CNA, OPG, NB Power | “Multiple Certifications” wording is not aligned with Section 1 Introduction. | The CNSC may certify a worker as qualified to carry out the duties of ~~for employment in~~ more than one designated position, as long as… | | | Clarification | |  |
|  | **Page 14**  **Section 3.2 b** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | … an inactive status is assigned to any certified worker who holds a valid certificate, but was  formally removed from duty in accordance with  subsection 18.3 or 18.4; ~~either one of the processes specified in subsections 18.3 or and 18.4;~~ | | | Clarification | |  |
|  | **Page 14**  **Section 3.2**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | Typo in “End of Employment”. | …unless the worker is reinstated to duty as per subsection 18.5~~18.5~~ before …. | | | Clarification-  Editorial | |  |
|  | **Page 14**  **Section 4** | Bruce Power,  CNA, OPG, NB Power | Current list of designated positions is reflective of the current licenced facilities and implies that these positions will be required at all future facilities. | Add guidance to explain that these four positions reflect only those at the currently licensed facilities. | | | **MAJOR** | | Does not allow for different operating organization structures that may be proposed for future SMRs. |
|  | **Page 14**  **Section 4 c** | Bruce Power,  CNA, OPG, NB Power | Missing an acronym. | c. shift supervisor (SS); and | | | Clarification-  Editorial | |  |
|  | **Page 15**  **4.1** | Bruce Power,  CNA, OPG, NB Power | Typo | … and are associated with the generic classes of  designated positions listed in Appendix A. | | | Clarification-Editorial | |  |
|  | **Page 15**  **4.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | When in possession of a valid certificate, workers are deemed qualified to perform the duties of the pertinent site-specific positions listed in Appendix A in accordance with the licensee’s established management system.~~, including the roles and responsibilities documentation found acceptable by the CNSC.~~ | | | Clarification | |  |
|  | **Page 15**  **5.1** | Bruce Power,  CNA, OPG, NB Power | Section 5.1 deals with applications for certification, renewal of certification, and requests for decertification. The section does not mention requests for opportunities to be heard or applications for examinations and tests, while sections 6.3 and 7 refer back to section 5. | Revise section 5 to include requests for opportunities to be heard and applications for SHP examination and tests. | | | Clarification | |  |
|  | **Page 16**  **5.2.2**  **Guidance**  **Page 19**  **5.3.2**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | The definition of “Worker Competency” is repeated in several instances: | Move the definition of “Worker Competency” to the Glossary section on Page 69. | | | Clarification | |  |
|  | **Page 17**  **5.2.3** | Bruce Power,  CNA, OPG, NB Power | Requirement could be written more clearly, with less repetition in the document. | The application shall describe how the applicable prerequisites of the personnel selection program mandated in section 12 were met.~~, including, but not limited to:~~  ~~a. the worker’s education or literacy level upon selection for initial training;~~  ~~b. any education or literacy level equivalency recognized by the licensee;~~  ~~c. any prior work experience required by the CNSC or the licensee;~~  ~~d. any personnel selection interview undergone by the worker;~~  ~~e. any personnel selection test administered to the worker, including any medical screening; and~~  ~~f. any exemption explicitly sanctioned in this REGDOC that was employed by the licensee.~~ | | | Clarification | |  |
|  | **Page 17**  **5.2.4** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and the requirement should be limited to the “certification” related training. | The application shall provide a chronological summary of the qualifications achieved by the worker covering the initial certification training components, the certification examinations, and all other personnel certification requirements ~~milestones~~ successfully completed by the worker. | | | Clarification | |  |
|  | **Page 17**  **5.2.4 &**  **Page 19**  **5.3.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | ~~The worker qualification summary should offer sufficient evidence that the worker meets all of~~  ~~the applicable qualifications specified in Part II. At a minimum,~~ This summary shall include, as  applicable depending on the designated position: | | | Clarification | |  |
|  | **Page 17**  **5.2.4 a.** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | a. the date of each ~~cumulative or final~~ formal evaluation marking the completion of each initial training component; | | | Clarification | |  |
|  | **Page 17**  **5.2.4 e.** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | e. the date of completion of any period of working under supervision (WUS), including the total number of supervised work hours; | | | Clarification | |  |
|  | **Page 17**  **5.2.4**  **Guidance &**  **Page 19**  **5.3.3**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Move the following text under guidance section:  The worker qualification summary should offer sufficient evidence that the worker meets all of the applicable qualifications specified in Part II. | | | Clarification | |  |
|  | **Page 17**  **5.2.5 &**  **Page 19**  **5.3.4** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Delete “comprehensive”:  For example; The licensee is not required to append any supporting documentation to the application as proof of competency; however, ~~comprehensive~~ personnel records shall be maintained in accordance with subsection 19.2 and made available for verification by the CNSC upon request. | | | Clarification | |  |
|  | **Page 19**  **5.3.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | The application shall provide a chronological summary of the requalification requirements met by the worker during the current certification period covering the continuing training components, the requalification tests, and all other personnel certification requirements ~~milestones~~ successfully completed by the worker. | | | Clarification | |  |
|  | **Page 19**  **5.3.3 a.** | Bruce Power,  CNA, OPG, NB Power | Could be written more clearly, with less repetition in the document. | a. confirmation that the worker attended continuing training and successfully underwent formal evaluations compliant with the requirements specified in section 13.~~, including suitable update, refresher, simulator-based, and nuclear emergency response training;~~ | | | Clarification | |  |
|  | **Page 19**  **5.3.3 d.** | Bruce Power,  CNA, OPG, NB Power | This requirement should be aligned with section 18.2.1 and Appendix B. | d. the total number of complete shifts and hours of shiftwork in the designated position performed by the worker during each quarter of ~~over~~ the current certification period; | | | Clarification | |  |
|  | **Page 20**  **5.3.5**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | Per section 18.4.4, when a certificate expires, the licensee must remove a person from the designated position.  When a certificate is not issued before the current one expires, due to CNSC processing delays, the effective date of the new certificate should be the date of the CNSC decision, not the date of expiry of the previous certification. | Certificate Expiry – When the certificate expires before the application can be processed by  CNSC staff and a renewed certificate issued by the CNSC, the effective date of the certification  renewal will be that of the certification decision made by the Commission or a DO. ~~made to coincide with the date of expiry of the existing certification.~~ | | | **MAJOR** | | The CNSC suggested wording will prevent the individual from having the full benefit of the new 5-year certification period. |
|  | **Page 20**  **5.3.6**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | In guidance, “Limitation” seems to contradict section 5.3.5, which does not specify when a renewal application should be submitted, in that a renewal application requesting an “early” effective date is subject to a 60-day validity window, while a normal renewal is not.  CNSC’s suggested wording seems to be written as a requirement. | Limitation – In order to provide licensees with scheduling flexibility, the CNSC allows the  renewal of the certification of reactor facility workers at any time before the end of the certificate validity period. This allowance is made because shortening the certification period effectively increases the requalification testing frequency. ~~However, the CNSC will not postpone the effective date of the certification renewal any more than 60 calendar days past the effective date~~  ~~of the application for certification renewal. This restriction is imposed to ensure that the proof of~~  ~~worker competency provided at the time of application is relatively recent, and is therefore valid.~~ | | | Clarification | |  |
|  | **Page 20**  **5.4,** **5.4.1,**  **Page 22**  **5.5, 5.5.1, 5.5.3**  **Page 30 & 31**  **9.4 , 9.4.1, 9.4.2, 9.4.3, 9.4.5 Guidance, 9.5, 9.5.2, 9.5.3, 9.5.4, &**  **Page 36**  **10.3** | Bruce Power,  CNA, OPG, NB Power | The term “recertification” is not present in the NSCA or the Class 1 Facilities Regulations. | Replace “Recertification” with “Certification”  For example; Application for ~~Re~~Certification within Five Years of a Certificate Expiry | | | Clarification | |  |
|  | **Page 20**  **5.4** | Bruce Power,  CNA, OPG, NB Power | Typo; section 5.2 is for initial certification applications. | In addition to the general provisions specified in subsection 5.1 ~~5.2~~, an application for certification  submitted … | | | Clarification-Editorial | |  |
|  | **Page 20**  **5.4.1** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | A worker whose certificate expired more than five (5) years prior to the date of application shall ~~must~~  meet the ~~additional~~ requirements specified ~~later~~ in subsection 5.5. | | | Clarification | |  |
|  | **Page 21**  **5.4.2**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Important Note – To satisfy the condition set by subsection 9(2) of the Class I Regulations, the  correct worker competency declaration ~~for a recertification~~ is the same as the one required for an initial certification. | | | Clarification | |  |
|  | **Page 21**  **5.4.2 b**  **and**  **5.4.3 b & c.** | Bruce Power,  CNA, OPG, NB Power | 5.4.3 b & c specify “test”, which contradicts section 5.4.2 b, which specifies “examination”. | **5.4.2 Worker Competency Declaration**  In accordance with regulations, the application shall state that the worker:  b. has successfully completed the applicable training program and requalification tests ~~examination~~ referred to in the licence; … | | | **MAJOR** | | Licensees cannot implement the REGDOC when two sections define contradicting requirements to be implemented at the same time. |
|  | **Page 21**  **5.4.4 c, d, e & f** | Bruce Power,  CNA, OPG, NB Power | Section 19.2 requires licensees to retain, and make available to the CNSC upon request, personnel training records, and should not be required to submit such records with certification applications. | c. the date of the knowledge-based requalification test successfully completed by the worker~~, including the worker’s answers and the grade, in percentage, obtained by the worker;~~  d. the date of the performance-based requalification test or series of tests successfully completed by the worker;  ~~e. a suitable record, signed by an authorized licensee representative, of the WUS hours completed by the worker; and~~  ~~f. a recording, transcript, or the minutes of the mandated management interview.~~  e. the date of completion of any period of work under supervision, including the total number of supervised work hours; and  f. the date of the management interview. | | | **MAJOR** | | Increased requirement and administrative burden beyond a normal renewal application with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 22**  **5.5.2**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Important Note – To satisfy the legal requirement set by subsection 9(2) of the Class I Regulations, the correct worker competency declaration ~~for a recertification~~ is the same as the one required for an initial certification. | | | Clarification | |  |
|  | **Page 23**  **5.5.3 b ii & iii** | Bruce Power,  CNA, OPG, NB Power | Section 19.2 requires licensees to retain, and make available to the CNSC upon request, personnel training records, and should not be required to submit such records with certification applications | ii. the date of the knowledge-based certification examination successfully completed by the worker~~, including the worker’s answers and the grade, in percentage, obtained by the worker~~;  iii. the date of the performance-based certification examinations successfully completed by the worker; | | | **MAJOR** | | Increased requirement and administrative burden beyond a normal renewal application, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 23**  **5.5.4 a, b, c & d** | Bruce Power,  CNA, OPG, NB Power | ~~a. the tailored training needs analysis (TNA) or a summary of the said TNA;~~  ~~b. the individual training plan (ITP) or a summary of the ITP;~~  ~~c. the knowledge-based certification examination successfully completed by the worker,~~  ~~including the worker’s answers and the grade, in percentage, obtained by the worker;~~  ~~d. the performance-based certification examination successfully completed by the worker;~~ | | |
|  | **Page 23**  **5.5.4 e & f** | Bruce Power,  CNA, OPG, NB Power | ~~e. a suitable record, signed by an authorized licensee representative, of the WUS hours~~  ~~completed by the worker; and~~  ~~f. a recording, transcript, or the minutes of the mandated management interview.~~  e. the date of completion of any period of work under supervision, including the total number of  supervised work hours; and f. the date of the management interview. | | |
|  | **Page 23**  **6.1** | Bruce Power,  CNA, OPG, NB Power | Suggest adding the following guidance. | Important Note – To satisfy the legal requirement set by subsection 11(1) of the Class I Regulations, the CNSC shall notify a licensee and the person of a proposed decision not to certify the person, as well as the basis for the proposed decision, at least 30 days before refusing to certify the person. | | | Clarification | |  |
|  | **Page 24**  **6.3** | Bruce Power,  CNA, OPG, NB Power | Requirements should use the word “SHALL”. | All such requests shall ~~should~~ contain the information and be transmitted to the CNSC … | | | Clarification | |  |
|  | **Page 24**  **6.3 &**  **Page 24**  **7.** | Bruce Power,  CNA, OPG, NB Power | Sections 6.3 & 7 should not refer to all of 5.1; just 5.1.2 to 5.1.4. Section 5 is titled "Personnel Certification Applications", while section 6 is related to refusal to certify and decertification. | Replace 5.1 with 5.1.2 to 5.1.4, for example;  … with the general provisions specified in subsections ~~5.1~~ 5.1.2 to 5.1.4. | | | Clarification | |  |
|  | **Page 24**  **7 a.** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | … specifying the ~~effective~~ date of completion of the initial or continuing training referenced in  section 10; | | | Clarification | |  |
|  | **Page 26**  **9 c.** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | c. shift supervisor (SS). | | | Clarification-Editorial | |  |
|  | **Page 26**  **9.1.1** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear, and should use wording similar to section 10.1.1. | The worker must have met, prior to the start of their initial training, the ~~basic~~ prerequisites  specified in subsection 12.2 as part of the personnel selection program mandated in section 12.  **OR**  The worker must have met, prior to the start of their initial training, any applicable position specific prerequisites set by the licensee as part of the personnel selection program mandated in  section 12. | | | Clarification | |  |
|  | **Page 26**  **9.1.2** | Bruce Power,  CNA, OPG, NB Power | This revision of the requirement focusses on the worker, while current version focusses on the training.  The proposed wording is not aligned with the Science Fundamentals and Equipment Principles (SF&EP/Generals) training that has been established in accordance with a Systematic Approach to Training (SAT) and accepted by the CNSC. | The worker must have successfully completed general training based on a training system ~~and must possess adequate knowledge of the applied science and engineering principles relevant to the design and operation of the reactor(s) and the systems, subsystems, and equipment installed in the reactor facility identified in the licence.~~  covering the science fundamentals and equipment principles relevant to the operation of a reactor facility. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 26**  **9.1.2** | Bruce Power,  CNA, OPG, NB Power | 9.1.2 does not address how a licensee confirms a worker “possesses adequate knowledge”, while current version requires formal written evaluations. Section 13.4 does require formal evaluations, but the linkage to 9.1.2 is unclear. | Add:  This training shall include formal learner evaluations, mandated in section 13.4, that confirms at the completion of the training, the person has adequate knowledge to perform the duties of the relevant designated position. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **9.1.3**  **Page 26** | Bruce Power,  CNA, OPG, NB Power | This revision of the plant experience requirement focusses on a worker’s “knowledge”, while current version focusses on a set period of time.  9.1.3 does not address how a licensee confirms a worker “possesses adequate knowledge”. Section 13.4 requires formal evaluations be a component of training, but the linkage to 9.1.3 is unclear.  For new facilities, information on physical layout, time to operate, and organizational structure may not be available until commissioning is under way.  “Time to operate” and “organizational structure” are not addressed before the start of the station-specific phase of training. | The worker must have successfully completed, prior to the start of the station-specific training specified next in sub-subsection 9.1.4, plant familiarization training based on a training system.  **Guidance:**  Plant familiarization training should address:  a. the physical layout of the reactor facility identified in the licence, including the location and size of the major systems, subsystems and equipment., ~~and the time and effort required for field personnel to operate, upon direction by certified workers, the systems, subsystems, and equipment located outside of the main control room (MCR); and~~  ~~b. the organizational infrastructure necessary to operate the said reactor facility under normal, abnormal, and emergency conditions, including the mandate, roles and responsibilities of the key personnel and groups of personnel.~~ | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 27**  **9.1.4** | Bruce Power,  CNA, OPG, NB Power | 9.1.4 does not address how a licensee confirms a worker “possesses adequate knowledge”.  Section 13.4 does require formal evaluations be a component of training, but the linkage to 9.1.4 is unclear. | The worker must have successfully completed ~~baseline~~ station-specific training based on a training system ~~and must possess adequate knowledge~~ of the design and the ~~precise~~ operation, under normal, abnormal, and emergency conditions, of the reactor(s) and associated systems, subsystems, and equipment installed in the reactor facility identified in the licence.  This training shall include formal learner evaluations, mandated in section 13.4, that confirm, at the completion of the training, the person has adequate knowledge to perform the duties of the relevant designated position. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 27**  **9.1.4 Guidance** | Bruce Power,  CNA, OPG, NB Power | 1) As written, the statement is unclear.  2) Typo. | Clarification – The ~~baseline~~ station-specific training covers the station-specific knowledge that,  for ASO candidates, is required of a certified ASO or, for RO and shift supervisor candidates, is  required of a certified RO. ~~In other words,~~ Shift supervisors are expected to possess station specific knowledge equivalent to that of ROs, in addition to the supplementary station-specific  knowledge specified later in subsection 9.2~~9.2~~ | | | Clarification | |  |
|  | **Page 27**  **9.1.5** | Bruce Power,  CNA, OPG, NB Power | Implementation of a system’s approach to training should ensure nuclear emergency response training is addressed, if required by the analysis.  As written, the statement is unclear. | Delete 9.1.5 or; as a minimum, revise as follows:  The worker must have successfully completed ~~possess adequate knowledge of~~ training on nuclear emergency response (NER) and the management of beyond-design-basis accidents (BDBA), based on a training system. ~~including the roles and responsibilities of certified workers regarding emergency operating procedures and severe accident management.~~ | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 27**  **9.1.6** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | The worker must have successfully completed on-the-job training (OJT) based on a training  system ~~covering the relevant knowledge and skills (K&S) and safety-related attributes acquired or~~  ~~reinforced most effectively through OJT.~~ | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 27**  **9.1.7** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | The worker must have successfully completed simulator-based training based on a training  system ~~covering the relevant K&S and safety-related attributes acquired or reinforced most~~  ~~effectively through simulated scenarios.~~ | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 27**  **9.1.8** | Bruce Power,  CNA, OPG, NB Power | In October 2021, OPG/BP/NBP recommended the CNSC allow licensees to conduct science fundamentals, equipment principles and radiation protection training prior to commencing the initial certification training program, and the requirement to conduct a separate general examination be removed. | Delete section 9.1.8, such that a separate Knowledge-based General Certification Examination is not required. | | | **MAJOR** | | CNSC’s initial response was that this proposal would not be addressed for this revision. Industry wants to ensure that this proposal is considered for next revision. |
|  | **Page 27**  **9.1.8** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and should be aligned with current wording in CNSC EG1. | The worker must have successfully completed a general knowledge examination that samples topics covered in the training specified in section 9.1.2. ~~confirming that the worker possesses the general knowledge necessary to perform the duties of the pertinent designated position safely and competently.~~ | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current examination process as mandated by CNSC EG1. |
|  | **Page 27**  **9.1.9** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and should be aligned with current wording in CNSC EG1. | The worker must have successfully completed a station-specific knowledge examination that samples topics covered in the training specified in section 9.1.4 ~~confirming that the worker possesses the station-specific knowledge necessary to perform the duties of the pertinent designated position safely and competently.~~ | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current examination process as mandated by CNSC EG1. |
|  | **Page 27**  **9.1.10** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and should be aligned with current wording in CNSC EG2.  CNSC proposal is a significant change in the scope of the initial simulator-based examination mandated by CNSC EG2. | The worker must have successfully completed, within two (2) years of the application for certification, a performance-based certification examination conducted in a full-scope simulator or an approved alternative to the full scope simulator. This examination samples topics covered in the training specified in section 9.1.7 and is aimed at providing assurance that, at the time of their certification, workers have the level of knowledge and skills required to respond to abnormal operating conditions at their facility. ~~confirming that the worker can perform the duties of the pertinent designated position safely and competently.~~ | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current examination process as mandated by CNSC EG2. |
|  | **Page 28**  **9.1.11** | Bruce Power,  CNA, OPG, NB Power | The concept of “Work Under Supervision (WUS)” cannot be applied to new facilities. | CNSC should develop criteria or an exemption that can be applied to a newly built or first of a kind facility. | | | **MAJOR** | | Document cannot be implemented as written for new facilities. |
|  | **Page 28**  **9.1.12**  **Page 31**  **9.4.5**  **Page 32**  **9.5.6** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and the Industry suggested revision focusses the requirement on the interview, not the manager.  “Authorized” manager is undefined. | The worker must have successfully undergone a formal management interview ~~conducted by a an~~  ~~authorized manager~~ that ~~who thereby~~ confirmed the worker can perform the duties of the pertinent designated position safely and competently. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 28**  **9.1.12**  **Page 31**  **9.4.5**  **Page 33**  **9.5.6**  **Page 28**  **9.1.10**  **Page 29**  **9.3.2/9.3.3**  **Page 30**  **9.4.2/9.4.3**  **Page 32**  **9.5.3/9.5.4** | Bruce Power,  CNA, OPG, NB Power | The following guidance regarding is repeated throughout the document:  1) when the management interview is conducted  2) examination and test expiry dates | Suggest move to Glossary section on Page 69. | | | Clarification | |  |
|  | **Page 28**  **9.2.1** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | The worker must have met the supplementary prerequisites for shift supervisors specified in  subsection 12.2 ~~as part of the personnel selection program mandated in section 12.~~ | | | Clarification | |  |
|  | **Page 28**  **9.2.2**  **Page 29**  **9.2.3** | Bruce Power,  CNA, OPG, NB Power  Bruce Power,  CNA, OPG, NB Power | The concept of supplementary training and a subsequent supplementary examination is linked to the operating structure at currently licensed facilities and does not allow for different operating organization structures that may be proposed for future SMRs.  Current list of designated positions in section 4 implies these positions and the related training/examinations will be required at all future facilities. | Add guidance to explain that this training and examination is only required at licensed facilities that use an operating organization as reflected by Section 4. | | | **MAJOR** | | Does not allow for different operating organization structures that may be proposed for future SMRs. |
|  | **Page 28**  **9.2.2** | Bruce Power,  CNA, OPG, NB Power | 9.2.2 does not address how a licensee confirms a worker “possesses supplementary knowledge”.  Section 13.4 does require formal evaluations be a component of training, but the linkage to 9.2.2 is unclear. | The worker must have successfully completed supplementary station-specific training, based on a training system,  ~~and must possess~~ of the supplementary knowledge specifically required of shift supervisors concerning the design and the ~~precise~~ operation, under normal, abnormal, and emergency conditions, of the reactor(s) and associated systems, subsystems, and equipment installed in the reactor facility identified in the licence.  This training shall include formal learner evaluations, mandated in section 13.4, that confirm at the completion of the training, the person has adequate knowledge to perform the duties of the relevant designated position. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 29**  **9.2.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and should be aligned with current wording in CNSC EG1. | The worker must have successfully completed a supplementary station-specific knowledge examination that samples topics covered in the training specified in section 9.2.2 ~~confirming that the worker possesses the supplementary station-specific knowledge specifically required of shift supervisors to perform their duties safely and competently.~~ | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current examination process as mandated by CNSC EG1. |
|  | **Page 29**  **9.3.1** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | The certified worker must have successfully completed continuing training based on a training system ~~comprising knowledge and performance-based refresher and update components delivered by means of effective instructional methods, including simulator-based training.~~ | | | Clarification | |  |
|  | **Page 29**  **9.3.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | … conducted in a full-scope simulator or approved alternative simulator confirming that the worker … | | | Clarification | |  |
|  | **Page 30**  **9.3.4** | Bruce Power,  CNA, OPG, NB Power | For consistency, requirements should be written using “SHALL”. | The certified worker shall ~~must~~ have been sufficiently employed in the pertinent designated position to maintain an adequate competency level. | | | Clarification | |  |
|  | **Page 30**  **9.4.1** | Bruce Power,  CNA, OPG, NB Power | Use of the term “tailored” training is new terminology and expectations are unclear. | **9.4.1 Individual ~~Tailored~~ Training Plan**  The worker must have successfully completed ~~approved tailored~~ training, comprising of knowledge  and performance-based refresher and update training, based on a ~~documented, tailored training~~  ~~needs analysis (TNA) and a~~ documented individual training plan (ITP).  At a minimum, this ~~tailored~~ training shall cover any scheduled refresher training and update training, including any simulator-based training, that the worker missed during the interim period between the certificate expiry and the application for recertification. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 30**  **9.4.1** | Bruce Power,  CNA, OPG, NB Power | An individual training plan includes the completion of a needs assessment and does not need to be mandated. | **9.4.1 Individual ~~Tailored~~ Training Plan**  The worker must have successfully completed ~~approved tailored~~ training, comprising of knowledge  and performance-based refresher and update training, based on a ~~documented, tailored training~~  ~~needs analysis (TNA) and a~~ documented individual training plan (ITP).  At a minimum, this ~~tailored~~ training shall cover any scheduled refresher training and update training, including any simulator-based training, that the worker missed during the interim period between the certificate expiry and the application for recertification. | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 30**  **9.4.2** | Bruce Power,  CNA, OPG, NB Power | Not aligned with CNSC document” Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants”, Revision 2, May 1, 2009.  Industry suggested change in wording reflects current testing process as mandated by CNSC document ”Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants”, Revision 2, May 1, 2009. | The certified worker must have successfully completed, within two (2) years of the application for recertification, a knowledge-based requalification test or series of tests aimed at demonstrating ~~confirming~~ that the worker has retained the knowledge necessary to perform the duties of the pertinent designated position safely and competently | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current process as mandated by CNSC document: Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants”, Revision 2 |
|  | **Page 30**  **9.4.3** | Bruce Power,  CNA, OPG, NB Power | Not aligned with CNSC document” Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants”, Revision 2, May 1, 2009.  Industry suggested change in wording reflects current testing process as mandated by CNSC document ”Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants”, Revision 2, May 1, 2009. | The certified worker must have successfully completed, within two (2) years of the application for recertification, and in a lead role, a comprehensive simulator-based requalification test aimed at demonstrating ~~confirming~~ that the worker can perform the duties of the pertinent designated position safely and competently. | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current process as mandated by CNSC document: Requirements for the Requalification Testing of Certified Shift Personnel at Nuclear Power Plants”, Revision 2. |
|  | **Page 34**  **10.1.2** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | ~~Irrespective of any applicable prerequisites set by the licensee as part of the personnel selection~~  ~~program, the~~ The worker shall: | | | Clarification | |  |
|  | **Page 34**  **10.1.3** | Bruce Power,  CNA, OPG, NB Power | CNSC has eliminated Section 19, Transfer to another Nuclear Power Plant, for the SHP.  Under the current model, a licensee could provide gap training on systems, etc. and then present a candidate for certification. | Reinstate the requirements given in current REGDOC in **Section 19: Transfer to another Nuclear Power Plant**  A person, who holds a certification as senior health physicist at a given Canadian NPP, seeking certification for the same position after transferring to another NPP shall, at the time of certification at this NPP, meet the requirements specified in subsections 19.1 to 19.3.  19.1 Training requirements …  19.2 Nuclear power plant management interview ..  19.3 CNSC examination … | | | **MAJOR** | | For a new facility, it is unclear how a licensee could certify an SHP (Senior Health Physicist). |
|  | **Page 34**  **10.1.3** | Bruce Power,  CNA, OPG, NB Power | Increases current requirement from six months to two years and it could be written clearer. | ~~Irrespective of any applicable prerequisites set by the licensee as part of the personnel selection~~  ~~program,~~ the worker shall possess at least four (4) years of relevant experience, including two (2)  years as a health physicist or an equivalent position at a ~~the~~ reactor facility, with 6 months at the facility identified in the licence. | | | **MAJOR** | | Increase in burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 34**  **10.1.5** | Bruce Power,  CNA, OPG, NB Power | Section 10.1.5 should be guidance, or the section removed completely; duplication of sections 10.1.2, 10.1.3 and 10.1.4. | Delete section 10.1.5. | | | **MAJOR** | | This section is redundant and adds burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 35**  **10.1.6**  **Page 36**  **10.3.3** | Bruce Power,  CNA, OPG, NB Power  Bruce Power,  CNA, OPG, NB Power | Could be written more clearly; Industry suggested revision focusses the requirement on the interview, not the manager.  “Authorized” manager is undefined. | The worker must have successfully undergone a formal management interview ~~conducted by an~~  ~~authorized manager who thereby~~ that confirmed that the worker can perform the duties of a SHP  safely and competently. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 35**  **10.1.7** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear, and should be aligned with current requirements of REGDOC 2.2.3 Volume III. | The worker must have successfully completed **an oral** knowledge-based examination administered by  CNSC staff ~~covering the radiation protection principles, methods, and practices related to the~~  ~~operation of the reactor facility identified in the licence.~~ that samples topics covered in the training specified in section 10.1.4. | | | **MAJOR** | | Regulatory uncertainty due to the inconsistency with the current examination process as mandated by the current version of REGDOC 2.2.3 Volume III. |
|  | **Page 35**  **10.1.7**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | Appendix C is listed as **guidance**, but can be interpreted as a **mandatory** list of training topics, developed outside of a licensees training system; thus requiring it to be trained so it can be examined by CNSC. | Delete the guidance and Appendix C. | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 36**  **10.2.3**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | Typo | Knowledge Areas – ~~Article A.~~Appendix C provides a summary of the key knowledge areas … | | | Clarification- Editorial | |  |
|  | **Page 37**  **11.1, 11.2, 12,**  **Page 40**  **12.5,**  **Page 47**  **14.4,**  **Page 48**  **15**  **Page 49**  **16, 17.1**  **Page 50**  **18.1Page 57**  **19 &**  **Page 63**  **21.5.4** | Bruce Power,  CNA, OPG, NB Power | Use of the word “effective”, as written, the statements are unclear.  . | Delete “effective”:  For example; The licensee shall establish and document ~~effective~~ policies and procedures…  The licensee shall establish and document ~~an effective~~ process to … | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 37**  **12.1** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | As an integral part of the ~~mandated~~ personnel selection program, … | | | Clarification | |  |
|  | **Page 37**  **12.1 d** | Bruce Power,  CNA, OPG, NB Power | A selection process does not necessarily include formal testing. Candidates are selected by a facilities’ operating organization, and the process used may not be developed in accordance with a training system.  *(Aligns with Section 19.2.c comment 119)* | d. shall assess if candidates meet the applicable minimum standards of literacy or numeracy;  ~~d. shall use standardized tests and proven methods to assess if whether or not candidates selected on the basis of a literacy or numeracy level, or a recognized equivalency, do in fact meet the applicable minimum standards of literacy or numeracy;~~ | | | **MAJOR** | | Increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 37**  **12.1.c**  **12.1. f**  **12.1. h** | Bruce Power,  CNA, OPG, NB Power | Not written as a requirement; uses “may” and “should”. | Move under Guidance heading. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 38**  **12.1. g** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | g. shall identify attributes and aptitudes deemed essential to safely and competently perform the  duties of the designated position~~, including integrity, leadership, and resilience, as may be~~  ~~pertinent~~; and | | | Clarification | |  |
|  | **Page 38**  **12.1**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | b. the management team with an opportunity to evaluate the prospective candidate against the  pertinent personal selection criteria~~, in particular any essential or desirable attribute, including~~  ~~integrity, leadership and resilience~~. | | | Clarification | |  |
|  | **Page 38**  **12.2.2** | Bruce Power,  CNA, OPG, NB Power | Uncertain how these requirements can be assessed and documented. | Delete 12.2.2. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 39**  **12.3.1 b** | Bruce Power,  CNA, OPG, NB Power | Uncertain how this requirement can be assessed and documented. | Delete 12.3.1 b. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 39**  **12.3.3 &**  **Page 42**  **12.5.6** | Bruce Power,  CNA, OPG, NB Power | This notification is duplication of information provided with the application for certification. | Delete this section. | | | **MAJOR** | | Increased administrative burden, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 39**  **12.4** | Bruce Power,  CNA, OPG, NB Power | This section implies that a facility must utilize a Senior Shift Supervisor (SSS) if they decide to allow Shift Supervisors to operate the station without utilizing the RO position, and implies the creation of a separate SSS training program.  Also implies the CRSS at current facilities must be SSS qualified and the CRSS at a currently licensed facility may not replace the SM during an emergency if the SM is incapacitated. | Delete this section. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 40**  **12.4.3** | Bruce Power,  CNA, OPG, NB Power | The concept of having to “Work Under Supervision (WUS)” for a specified number of complete shifts may be better applied at new facilities by requiring completion of a specified set of tasks, either in the plant or in the full scope simulator. | CNSC should allow for development of criteria that can be applied to a newly built or first of a kind facility. | | | Clarification | |  |
|  | **Page 40**  **12.4.3** | Bruce Power,  CNA, OPG, NB Power | Individuals will no longer be certified as senior shift supervisors. | The worker must have performed the duties of the senior shift supervisor under the supervision of  a worker qualified ~~certified~~ as senior shift supervisor for a number of complete shifts … | | | **MAJOR** | | REGDOC cannot be implemented as written. |
|  | **Page 40**  **12.4.4** | Bruce Power,  CNA, OPG, NB Power | Prior notification is not necessary. | The licensee shall inform the CNSC, ~~prior to allowing the worker to act as senior shift supervisor,~~  of any senior shift supervisor qualification received by the worker. | | | **MAJOR** | | Increased administrative burden, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 40**  **12.5** | Bruce Power,  CNA, OPG, NB Power | As written, section 12.5 requires experienced candidates to retake ALL of the General training and subsequent examination, even if the ceding reactor facility General training is partially aligned with the gaining facility. | CNSC should allow for the use of General SAT based GAP training. | | | **MAJOR** | | Inconsistent with current practices.  Increased candidate and administrative burden, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 41**  **12.5.1 b, c, d & e** | Bruce Power,  CNA, OPG, NB Power | These clauses are written as guidance. | Move 12.5.1 b, c, d & e under Guidance. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 41**  **12.5.1 a** | Bruce Power,  CNA, OPG, NB Power | This requirement as written cannot be controlled by the gaining licensee. | a. ~~should obtain,~~ shall request from the licensee of the ceding reactor facility: | | | **MAJOR** | | REGDOC cannot be implemented as written. |
|  | **Page 43**  **12.5.7** | Bruce Power,  CNA, OPG, NB Power | This section is related to initial certifications and should be included in section 5. | Move 12.5.7 to section 5. | | | Clarification | |  |
|  | **Page 43**  **13.1, 13.2** | Bruce Power,  CNA, OPG, NB Power | Use of the word “distinct” reduces flexibility. | The licensee shall implement and document ~~distinct~~ initial training programs specifically… | | | **MAJOR** | | Reduced flexibility and increased burden related to conduct of initial training programs with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 44**  **13.2.1** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear and should be aligned with current requirements. | ~~All~~ continuing training programs ~~designed to requalify certified workers~~ shall include ~~suitable~~  update training, including formal knowledge and performance-based evaluations, ~~covering any~~  ~~relevant technical or procedural changes implemented at the reactor facility identified in the~~  ~~licence, as well as the relevant lessons-learned acquired by the industry over time,~~ including, but  not limited to: | | | **MAJOR** | | Change from wording of current REGDOC provides increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 44**  **13.2.1** | Bruce Power,  CNA, OPG, NB Power | Potential for misinterpretation. | Delete:  ~~The licensee shall deliver the knowledge update training referenced in this REGDOC promptly following the occurrence of the initiating change or event using effective instructional methods, including suitable simulator-based training whenever pertinent.~~ | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 44**  **13.2.2** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | All continuing training programs designed to requalify certified workers shall include suitable refresher training, including formal knowledge and performance-based evaluations, and be based on a training system. ~~covering the essential K&S and safety-related attributes that certified workers acquired during their initial training and which must be periodically reviewed and applied to ensure adequate retention.~~ | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 44**  **13.2.2** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | The licensee shall deliver the knowledge refresher training referenced in this REGDOC on a regular basis and according to a training cycle not exceeding five (5) years, ~~using effective instructional methods, including suitable simulator-based training whenever pertinent.~~ | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 44**  **13.2.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | ~~All~~ continuing training programs ~~designed to requalify operations personnel~~ shall include ~~suitable~~ simulator-based training based on a training system. ~~designed to ensure that operations personnel maintain their qualification by applying their K&S and safety-related attributes through recurrent performance-based training covering varied simulated scenarios under normal, abnormal and, to the extent possible, emergency conditions.~~ | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 45**  **13.3** | Bruce Power,  CNA, OPG, NB Power | Management of Contractors must be in accordance with REGDOC 2.1.1, Management System, and duplication of this topic should not be included in REGDOC 2.2.3.  Per the guidance given is REGDOC 2.2.3 section 3.1, a licensee is fully responsible for the competency of all workers employed at their reactor facility, even if the licensee decides to contract out any aspect of the training programs.  Direct CNSC involvement in the conduct of a licensee’s management system is an over-reach of regulatory responsibilities and may result in significant delays in conduct of the licensee’s training programs. | Delete the second paragraph from section 13.3, or revise:  In the event that the licensee intends to contract out, in whole or in part, the responsibility for any aspect of the training referenced in this REGDOC, the licensee shall ~~obtain prior approval from the CNSC and, if such approval is granted, shall~~ ensure that the requirements and guidance specified in this ~~and any relevant complementary~~ REGDOC are complied with by the contracted party or parties. | | | **MAJOR** | | Duplication with other REGDOCs may lead to instances of regulatory uncertainty.  Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety.  CNSC involvement may result in a reduction in safety due to delays in conduct of training programs. |
|  | **Page 45**  **13.3**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Instructional Strategies and Methods – In implementing and administering the initial and continuing training referenced in this REGDOC, the licensee is free to employ any ~~effectual~~ instructional strategies and any combination of ~~recognized~~ instructional methods.~~, including self paced learning, remote learning, and e-learning.~~ | | | Clarification | |  |
|  | **Page 46**  **13.3 - Guidance** | Bruce Power,  CNA, OPG, NB Power | Typo | Training Program Samples – ~~Article A.~~ Appendix D contains examples | | | Clarification-Editorial | |  |
|  | **Page 47**  **14.2, 14.3** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | … applicable CNSC requirements specified or referenced in the licence ~~or accompanying licensing documentation~~. | | | Clarification | |  |
|  | **Page 47**  **14.4,**  **Page 48**  **15 &**  **Page 49**  **16** | Bruce Power,  CNA, OPG, NB Power  Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Delete “effective & mandatory”:  For example; The licensee shall establish and document effective procedures for preparing and conducting the various management interviews referenced in this REGDOC.  Each mandatory management interview shall serve an evaluation function and: …. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 49**  **16 d.** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | d. be documented ~~recorded~~ in writing or via any other retrievable medium, …. | | | Clarification | |  |
|  | **Page 49**  **17 &**  **17.1** | Bruce Power,  CNA, OPG, NB Power | Significant increase in requirements and regulatory burden.  While main requirement may be acceptable, the details should be given as guidance. | ~~17. Administrative Policies and Procedures Applicable to Workers in Training~~  ~~The policies and procedures specified in this section apply to any worker, whether certified or not, who is attending one of the initial training programs referenced in this REGDOC, in the context of, and in relation to, the said training.~~  **17~~.1~~ Reintegration of Worker in Initial Training Following a Prolonged Training Interruption**  The licensee shall establish and document a~~n effective~~ process to manage the case of any worker reintegrating into an initial training program after a prolonged training interruption.  Any worker who is absent from an initial training program for a period of six (6) months or more shall undergo a formal reintegration process.  **Guidance:**  As an integral part of this process, the licensee should ~~shall~~:  a. perform a formal evaluation, …;  b. determine the need for remedial training …;  c. formulate and implement a remedial …;  d. ensure that the worker, at a minimum, …; and  e. determine a suitable point of re-entry … .  ~~At a minimum, any worker who is absent from an initial training program for a period of six (6) months or more shall undergo a formal reintegration process meeting the requirements specified in this subsection.~~ | | | **MAJOR** | | Reduced flexibility and increased burden related to conduct of initial training programs with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 50**  **18.1** | Bruce Power,  CNA, OPG, NB Power | Fitness for Duty must be in accordance with CNSC REGDOC-2.2.4, Fitness for Duty: Managing Worker Fatigue and REGDOC-2.2.4, Fitness for Duty, Volume II: Managing Alcohol and Drug Use, and duplication of this topic should not be included in REGDOC 2.2.3. | Delete section 18.1 or revise:  **18.1 Fitness for Duty**  The licensee shall implement and document **~~effective~~** fitness-for-duty policies and procedures **~~providing the CNSC with reasonable assurance that certified workers are free of any physical or mental impairment that could hinder their ability to perform the duties of the pertinent designated position(s) safely and competently.~~**  **~~The fitness-for-duty policies and procedures applicable to certified workers shall be implemented~~** consistent**~~ly~~** with the requirements and guidance specified **~~in this and~~** complementary REGDOCs regarding fitness for duty **~~, including those related to the management of worker fatigue and the management of alcohol and drug use.~~**  ~~Guidance~~  ~~Complementary Regulatory Documents – Further requirements and guidance pertaining to the management of worker fatigue and the management of alcohol and drug use, including testing, can be found in the applicable complementary REGDOCs~~ listed as additional information at the end of this REGDOC. | | | **MAJOR** | | Duplication with other REGDOCs may lead to instances of regulatory uncertainty, leading to potential increased administrative burden, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 51**  **18.2.1** | Bruce Power,  CNA, OPG, NB Power | A licensee’s staffing complement must be in accordance with CNSC REGDOC 2.2.3, Minimum Staff Complement. Adherence to this REGDOC requires that the available number of certified operation’s staff be greater than those who are in a lead role. As per current practice, these additional certified staff should be able to count all worked shifts towards satisfying any mandated minimum employment requirement.  Suggested wording of 18.2.1 also implies that shifts worked during station outage (VBO) cannot be counted. | **18.2.1 Minimum Shift Requirement for Operations Personnel**  Any worker certified for employment as ASO, RO or shift supervisor shall perform the duties of a **~~lead~~** ASO, RO or shift supervisor for a minimum number **~~acceptable to the CNSC~~** of complete shifts per calendar quarter amounting to a minimum number **~~acceptable to the CNSC~~** of hours of shiftwork per calendar quarter, as accepted as part of the licensing basis.  **~~Each worker shall perform the mandated minimum employment as the lead incumbent, as opposed to a back-up or supernumerary capacity, and, to the fullest extent possible, in relation to a fuelled and operating reactor or group of reactors.~~** | | | **MAJOR** | | Increased requirement from current practice, leading to potential increased administrative and staffing burden, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 51**  **18.2.1**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | **Guidance**  Complete Shift – A complete shift means a minimum of four (4) consecutive hours of work in a designated position **~~as a lead operator or shift supervisor~~** that is preceded by a formal turnover of the responsibilities for the shift with an outgoing counterpart, and is concluded by an equal turnover with an incoming counterpart. | | | **MAJOR** | |  |
|  | **Page 51**  **18.2.1**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Compliance Scheme – ~~Article A.~~ Appendix B specifies the minimum shift requirements acceptable to the CNSC for the ~~pertinent~~ reactor facilities in service at the time of publication of the current version of this REGDOC | | | Clarification | |  |
|  | **Page 52**  **18.2.1**  **Guidance** | Bruce Power,  CNA, OPG, NB Power | Typo | … supervisor positions listed in ~~Article A.~~ Appendix A, and may therefore stand… | | | Clarification-Editorial | |  |
|  | **Page 53**  **18.4.3** | Bruce Power,  CNA, OPG, NB Power | Fitness for Duty must be in accordance with CNSC REGDOC-2.2.4, Fitness for Duty: Managing Worker Fatigue and REGDOC-2.2.4, Fitness for Duty, Volume II: Managing Alcohol and Drug Use, and duplication of this topic should not be included in REGDOC 2.2.3. | The worker is deemed unfit, by the licensee, to perform the duties of a designated position safely and competently, for any reason.  ~~The worker was the subject of a verified positive alcohol or drug test administered in accordance~~  ~~with the fitness-for-duty program mandated by the CNSC, or is otherwise deemed unfit, by the~~  ~~licensee, to perform the duties of a designated position safely and competently, for any reason.~~  ~~including, but not limited to:~~  ~~a. a medical or physical condition, be it permanent or temporary;~~  ~~b. a mental health condition, be it permanent or temporary;~~  ~~c. inadequate performance while on duty, including any action or decision that puts at risk the~~  ~~health and safety of workers, the public, or the environment;~~  ~~d. a demonstrated unwillingness or failure to take the necessary precautions to protect the health~~  ~~and safety of workers, the public, or the environment; and~~  ~~e. a demonstrated lack of integrity or trustworthiness.~~ | | | **MAJOR** | | Duplication with other REGDOCs may lead to instances of regulatory uncertainty, leading to potential increased administrative burden, with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 53**  **18.4.5** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | **18.4.5 Proposed Decision to Not Renew a Certification ~~Not to Certify~~ or to Decertify**  The worker was identified by the CNSC as the worker concerned in a proposed decision not to renew a certification ~~certify~~ or a proposed decertification, while a final certification decision by the Commission or a DO remains pending. | | | Clarification | |  |
|  | **Page**  **18.6.2** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | This ~~supplementary~~ requalification test must be equivalent in all respects, … | | | Clarification | |  |
|  | **Page 56**  **18.6.5** | Bruce Power,  CNA, OPG, NB Power | The licensee cannot reinstate a worker to the duties of the pertinent designated position who is not certified. | The licensee may reinstate a worker to the duties of the pertinent designated position who was the subject of a proposed decision not to renew a certificate ~~certify~~ or to decertify once officially informed of the Commission or DO’s decision to certify~~, or not to decertify,~~ the worker. | | | **MAJOR** | | Cannot be implemented as written. |
|  | **Page 57**  **19.1.2** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear.  Licensee should have the flexibility to manage their organization’s operating documentation. | The licensee shall retain, and make available to the CNSC upon request, a copy of the latest version of the licensee and station-specific policies, procedures, and technical diagrams referenced by certified workers to perform the duties of the designated positions. ~~safely and~~  ~~competently, including those related to:~~  ~~a. operating policies and principles;~~  ~~b. worker performance expectations;~~  ~~c. radiation protection;~~  ~~d. normal and abnormal operations;~~  ~~e. abnormal incidents;~~  ~~f. power reduction actions; and~~  ~~g. severe accident management.~~ | | | Clarification | |  |
|  | **Pages 58 and 59**  **19.2 b, c, d, e, f, g , h & n.** | Bruce Power,  CNA, OPG, NB Power | Use of the word “Comprehensive” in the requirement’s statements. | Delete “comprehensive” in 19.2 b, c, d, e, f, g, h & n. | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance instead of the well-defined requirement(s) of the approved licensing basis. This leads to increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Pages 58**  **19.2 c** | Bruce Power,  CNA, OPG, NB Power | Per the comment on section 12.1 d, a selection process does not necessarily include formal testing. Candidates are selected by a facilities’ operating organization, and the process used may not be developed in accordance with a training system. Detailed record keeping of such activities is not required.  (Aligns with Section 12.1.d comment 80) | Delete 19.2 c. | | | **MAJOR** | | Increased burden with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 60**  **20** | Bruce Power,  CNA, OPG, NB Power | Per the guidance given in REGDOC 2.2.3 section 3.1, a licensee is fully responsible for the competency of all workers employed at their reactor facility, and therefore responsible for all aspects of the training programs, including the training facilities.  Actual CNSC involvement in the conduct of a licensee’s training programs is an over-reach of regulatory responsibilities and may result in significant delays in conduct of the licensee’s training programs. | Delete second paragraph of section 20.  ~~All knowledge-based training, certification examinations, and requalification tests referenced in this REGDOC shall be delivered in facilities acceptable to the CNSC.~~ | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance of training facilities. This leads to increased burden with no obvious or corresponding improvement to nuclear safety.  CNSC involvement may result in a reduction in safety due to delays in conduct of training programs. |
|  | **Page 60**  **21** | Bruce Power,  CNA, OPG, NB Power | Per the guidance given is REGDOC 2.2.3 section 3.1, a licensee is fully responsible for the competency of all workers employed at their reactor facility, and therefore responsible for all aspects of the training programs, including the simulator facilities.  Actual CNSC involvement in the conduct of a licensee’s training programs is an over-reach of regulatory responsibilities and may result in significant delays in conduct of the licensee’s training programs. | Delete second paragraph of section 21.  ~~All performance-based training, certification examinations, and requalification tests referenced in this REGDOC shall be delivered using simulator facilities or systems acceptable to the CNSC.~~ | | | **MAJOR** | | Regulatory uncertainty results from the use of potential subjective criteria/expectations for acceptance of simulator facilities. This leads to increased burden with no obvious or corresponding improvement to nuclear safety.  CNSC involvement may result in a reduction in safety due to delays in conduct of training programs. |
|  | **Page 61**  **21.5** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | ~~In order to facilitate the conduct and grading of the performance-based certification examinations and requalification tests referenced in this REGDOC,~~ the simulator shall be equipped with adequate data-recording systems and equipment meeting the minimum requirements specified next in this subsection. | | | Clarification | |  |
|  | **Page 62**  **21.5.3 d** | Bruce Power,  CNA, OPG, NB Power | Significant increase from current requirements. | d. the identification~~, live and during replay~~, with the aid of the corresponding control panel photographs, of the controls and instruments used by the candidate(s) being evaluated ~~of the operating controls, instruments, and electronic or printed references used by the candidate(s) being evaluated;~~ | | | **MAJOR** | | Significant increase in cost and regulatory burden for the current accepted practice as documented in CNSC-EG2 with no obvious or corresponding improvement to nuclear safety. |
|  | **Page 65**  **Appendix B** | Bruce Power,  CNA, OPG, NB Power | Typo | Sub-Subsection 9.1.11~~9.1.11~~ | | | Clarification-Editorial | |  |
|  | **Page 65**  **Appendix B** | Bruce Power,  CNA, OPG, NB Power | By specifying 360 hours, the REGDOC does not allow for simplifications in technology at new facilities where the analysis demonstrates that such a number of hours is more than required. | Delete reference to 9.1.11 or,  The worker must have successfully performed ~~360 hours of~~ WUS, as specified by the licensee, in the pertinent designated position, under the supervision of a qualified worker certified to work in the said designated position. | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 65**  **Appendix B** | Bruce Power,  CNA, OPG, NB Power | As written, the statement is unclear. | Any worker certified for employment as ASO, RO or shift supervisor shall perform the duties of a ~~lead~~ ASO, RO or shift supervisor/senior shift supervisor, respectively, for a minimum of four (4) complete shifts per calendar quarter amounting to a minimum of 48 hours of shiftwork per calendar quarter. | | | Clarification | |  |
|  | **Page 66**  **Appendix C** | Bruce Power,  CNA, OPG, NB Power | Appendix C is listed as guidance, but can be interpreted as a mandatory list of training topics, developed outside of a licensees training system; thus requiring it to be trained so it can be examined by CNSC.  The appendix also includes new topics related to “international standards” that may be examined. | Clarify intent of C.2 Radiation Protection and revise:  The relevant topics include, but are not limited to:  ~~e. the relevant international standards, including those of the International Commission on Radiological Protection (ICRP).~~ | | | **MAJOR** | | By retaining too fine a level of detail in the requirements, the effectiveness of the licensees’ training system (SAT) process is diminished. |
|  | **Page 70**  **Abbreviations** | Bruce Power,  CNA, OPG, NB Power | Missing abbreviations used in the document. | BDBA Beyond-Design-Basis Accidents  NER Nuclear Emergency Response | | | Clarification | |  |