REGDOC-3.1.1, *Rapports à soumettre par les exploitants de centrales nucléaires*, version 3

Commentaires reçus dans le cadre du processus de consultation

Résumé des commentaires reçus :

• lors de la première période (du 29 avril au 28 juillet 2022) : 103 commentaires reçus de quatre (4) examinateurs

• lors de la période des observations (du 1 au 15 août 2022) : aucun commentaire reçu

Tableau A : Commentaires reçus lors de la première période

Organisation	Section ou para	Commentaires	Modifications proposées
Curve Lake First Nation	n.a.	This regulatory document helps CLFN understand what elements are reported from licensees to CNSC staff, when, and how. However, CLFN has trouble identifying how and when reportable events are to be communicated with Indigenous communities. Section 2, Reporting Requirements, mentions that "Licensees should use the situation or event reporting according to this regulatory document as an input to their public disclosure protocol as described by REGDOC-3.2.1, Public Information and Disclosure". However, REGDOC-3.2.1 in itself does not mention how reportable events are communicated with Indigenous communities. There is no clear process in place for proponents to report infringement on rights back to Indigenous community members. Currently, reportable events happening on licensees' sites may or may not be reported back to CLFN. It depends on companies' goodwill, whether the reportable event has an impact on Indigenous and/or treaty rights or not. When a reportable event is not shared and explained to CLFN directly, there is always higher concern over this event, because CLFN feels that the proponent is trying to hide something.	Recommendation: CNSC should ensure that proponents have a process in place to communicate reportable events to CLFN in an effective manner, not only through regulatory oversight reports. CNSC projects teams also need to have a way to verify whether the reporting has been done or not, and to account for this communication process in the regulatory oversight.
Bruce Power, OPG, NB Power	General	Industry appreciates the opportunity to provide feedback on this important document, which may impact more workers' everyday activities than virtually any other Regulatory Document. Given this, ensuring the REGDOC's structure,	

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		requirements and guidance are as clear as possible will avoid confusion, internal churn and the potential for error. Following a collective review by personnel with extensive experience applying versions 1 and 2 of *REGDOC-3.1.1* in the workplace, licensees have identified several areas where misunderstanding may be possible and detailed them in this table of comments. The intent of this feedback is to share the practical challenges of applying the proposed text as currently written. While improvements have clearly been made, some proposed changes may have unintended and negative impacts on nuclear safety and CNSC oversight. 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.Increased and duplicate reporting O Industry has significant concerns with the additional and repeat reporting in several of the quarterly and annual reports. As written, this draft requires all the same information as the current version of *REGDOC-3.11 plus* a significant amount of additional detail with no obvious or corresponding improvement to nuclear safety. O In particular, licensees seek targeted discussions on the following areas it believes will be most profoundly impacted: Section 3.1 and Appendix B related to the quarterly report on safety performance indicators, which seeks information already being presented in forums like the Quarterly Radiation Protection Meeting. Section 3.1 and the quarterly report on pressure boundaries, with particular focus on the additional requirement to report relief device failures on Class 1-6 systems that are not exempt per *CSA N285.0-17*.	

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		□ Section 3.4 and the inclusion of cyber security elements in the quarterly report on operational security. As currently written, the frequency of reporting may require some licensees to divert cyber security experts from core work to collect and submit information industry feels is more appropriately submitted annually. □ Section 3.5 and the annual report on radiation protection. Once again, much of the information requested is already provided in writing for the CNSC's quarterly meeting, ALARA Five-Year plans and Safety Performance Indicator (SPI) sheets. □ Section 4.2 on the proposed contents of detailed event reports that may cause confusion, concerns over privacy rights and unnecessary administrative churn. Additional discussion would also be helpful on section 4.4 to ensure the implications of event report retractions are fully understood. 2. Alpha radiation reporting O This update fails to amend reporting requirements for alpha radiation uptakes. This is a significant, missed opportunity to add much-needed clarity and address an ongoing, major issue. Simply stated, the existing alpha reporting threshold is too low to justify and not commensurate with the safety significance. Currently, reporting is required even when an alpha uptake: □ Is within the statutory dose limits defined by the CNSC. □ Does not reflect any safety issues or failure to apply the radiation protection program. □ Is so low that no dose assignment can be performed. □ Is so low it could not be detected by some licensees' monitoring equipment, which gives an inaccurate perception of risks at facilities with more sensitive monitors. 3. New definitions for 'Significant fuel damage', 'Serious process failure' and 'Structures, systems and components (SSC's) important to safety' O Licensees and CNSC staff both rely on a common understanding of these important terms and further discussion is needed to ensure the changes are fully understood.	

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Bruce Power, OPG, NB Power	General	When this draft refers to expectations around Q1, Q2, etc., is it referring to the CNSC's fiscal year (April 1-March 31) or that used by licensees (calendar year)? This is an important distinction and consideration.	Please clarify if the timing refers to the CNSC's fiscal year or licensees' calendar year.
Bruce Power, OPG, NB Power	Preface	Industry recognizes no change has been made to the Preface, but the statement in the highlight box is unclear when it says: "Nothing contained in this document is to be construed as relieving any licensee from any other pertinent requirements." Elements of *REGDOC-3.1.1* are indeed intended to relieve licensees from other pertinent requirements (ex: reporting timelines specified in the NSCA).	Amend the 2nd paragraph in the highlight box to read, "~~Nothing contained in this document is to be construed as relieving any licensee from any other pertinent requirements.~~ It is the licensee's responsibility to identify and comply with all applicable regulations and licence conditions." Also, add the interpretation document as a superseded document in the 4th paragraph.
Bruce Power, OPG, NB Power	1.2	The scope says, "This regulatory document applies to licensees of operating nuclear power plants." Accordingly, the references to *REGDOC-3.1.2* and *REGDOC-3.1.3* aren't necessary. REGDOCs are already cited in Licence Condition Handbooks. The scope should define what the document is, not what it is not.	For clarity, remove the references to *REGDOC-3.1.2* and *REGDOC-3.1.3.*
Bruce Power, OPG, NB Power	1.3	*REGDOC 3.1.1* is for Class 1 facilities, but this draft references *"Class II Nuclear Facilities and Prescribed Equipment Regulations"* as relevant legislation.	Remove the reference since *REGDOC-3.1.1* is for Class 1 facilities.
Bruce Power, OPG, NB Power	2	Industry seeks clarity on the 2nd last paragraph under Guidance on page 4 which currently reads, "Subsequent similar or additional reportable events associated with, or as a consequence of, a previously reported event do not require separate event reports. For example, reporting provision 11(b), in Appendix A, requires licensees to report all unplanned power reductions. A licensee reports a power reduction resulting from a problem with liquid zone (LZ) control. Until LZ control	Clarify: □ What kinds of events could be reported together? □ Who decides? □ Would unposted hazards in the same area be reported as the same event?

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		is fixed, all subsequent power reductions associated with the LZ problem originally reported do not require individual reporting."	
Bruce Power, OPG, NB Power	2	Clarity is sought for Clause 4, which says: □ "after becoming aware of a situation, event, dangerous occurrence or a specific reporting provision…" What is the timing expectation for "becoming aware?" Would it be discovery date? The date when a Station Condition Record/PICA is entered? □ Licensees "should also" use *CSA N290.7* to determine significance. This conflicts with clause 5, which may raise confusion and increase the likelihood of error when applying *REGDOC-3.1.1.* Should the reader use *CSA N290.7* or the internal significance process?	For clarity, CNSC staff is urged to delete clause 4 and maintain the current *REGDOC-3.1.1* wording where reporting is initiated upon a determination of meeting reporting requirements.
Bruce Power, OPG, NB Power	2	Clause 5 says, "the licensee shall use a safety significance classification process as documented in its management system to determine the safety significance for reports." Only a situation or event could have safety significance; a report by itself would have no safety significance. Industry believes this was likely intended to mean, "to determine the safety significance of situations or events for the purpose of reporting" but the previous text in *REGDOC-3.1.1* was adequately clear.	Maintain the wording in the current version of *REGDOC-3.1.1.*
Bruce Power, OPG, NB Power	2 Glossary	Regarding new clause 6: □ It is inappropriate to define requirements for SSCs in *REGDOC-3.1.1*. This should be contained in other appropriate REGDOCs. At best, it is unclear. At worst, it can lead to confusion or inconsistency in elements of the licensing basis. □ The word "may" in the final bullet is too broad when it says, "other SSCs whose failure may lead to safety concerns (e.g., process and control systems)." The intent was only to report if programmatic in nature. This vagueness creates confusion and other clauses cover proactive safety concerns of this nature (i.e. hazards). □ What does "complementary design features" mean in the 2nd bullet?	CNSC staff is urged to: □ Delete draft clause #6 □ Maintain the current wording for SSC in the Glossary □ Clarify what is meant by "complementary design features."

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Bruce Power, OPG, NB Power	2	Regarding clause 7: □ It's unclear why the reporting requirements are not consistent for the *PTNSR 2015*. Additionally, there is no associated clause in Appendix A for *PTNSR 2015,* Section 32. □ The guidance for clause 7 on page 4 says oral reports may be made to the duty officer, though Appendix A cites it as a requirement. □ The guidance for "Immediate reporting" is still unclear.	CNSC staff is urged to remove the exception for *PTNSR 2015* or clarify this requirement directly in Appendix A. For additional clarity, staff is urged to: □ Amend Appendix A to align with section 2 guidance that oral reports "may be made" to the duty officer. □ Clarify what threshold a licensee needs to meet for "immediate reporting."
Bruce Power, OPG, NB Power	2	The clarification for due dates in clause 8 is a welcome change and eliminates unnecessary complications with reporting due dates. However, the dates specified in the text are not 90 days after the end of each quarter (they may be up to 92 days after the end of the quarter). A minor editorial change will solidify this improvement. Also, bullet "c" is specific to Licence Conditions Handbooks or Power Reactor Operating Licences, not this REGDOC.	Amend bullet "a" to read," quarterly reports are due at the end of the following quarter: March 31, June 30, September 30, and December 31." Delete bullet "c" ~~annual compliance reports for Class II facilities and nuclear substances and radiation devices from the previous calendar year are due on March 31"~~
Bruce Power, OPG, NB Power	3	Under scheduled reporting, it's inappropriate to cite "3.10 Annual compliance reports for Class II nuclear facilities and for nuclear substances and radiation devices" in this REGDOC.	CNSC staff is encouraged to align radiation protection and dosimetry reports into a singular form and reporting scheme for NPPs. Currently, there are reporting overlaps between two CNSC divisions.

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Bruce Power, OPG, NB Power	3.1	The phrase, "The specifications and data sheets are provided on the CNSC website" should be moved to guidance. As stated, if the SPI data sheets change on the website, that change may have force-of- law.	Move the phrase, "The specifications and data sheets are provided on the CNSC website" to guidance.
Bruce Power, OPG, NB Power	3.1 App. B	Industry has major concerns with the increased – and often duplicate – level of reporting in sections of this draft document and requests this be discussed during a pre-publication workshop. For example, it's unclear how nuclear safety is enhanced by the level of additional detail proposed for the quarterly report on safety performance indicators. Specifically: □ This draft requires the same dose information the current REDOC as well as number of units operating, number of units being "rehabilitated," days in operation, average WB dose, and median WB dose, maximum WB dose (along with workgroup and job description), outage duration, number of workers receiving non zero dose broken down between outage and online. A category for dose reporting has also been added for forced outages. □ The current version requires personal contamination events (PCEs) by tier. This draft requires the same plus: skin dose from contamination events; SCR/CR numbers for Tier 1 and 2; a description of events; references to the governance numbers for PCE classification. It's also broken down by unit, though some licensees do not classify PCEs this way and don't generally calculate skin dose from PCEs. It is usually done when it exceeds a PCIR limit. If the dose estimate is <250 mrem (minimum recordable dose), 0 mrem is assigned. Maybe this should be changed to skin dose greater than the minimum recordable dose? □ The current version requires unplanned external and tritium exposures by tier. The CNSC definition of "unplanned" refers to "a radiation dose that exceeds the estimated dose in the radiological plan for associated work authorization or ALARA assessment." This REGDOC should clearly say this is for individual dose, not collective dose, and doesn't refer to dose exceeding the ALARA plan for	Industry urges CNSC staff to remove the additional reporting and retain the effective, well-understood requirements in the current version of *REGDOC-3.1.1.*

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		a job. This draft requires this information, plus a separate category for non-tritium internal exposure and the recording level. □ This draft also seeks the following new information: "For any unplanned internal exposure other than tritium, the licensees are to provide a brief description of the event, including the radionuclides of concern, such as radioiodine, C-14, MFAP or TRU, the dose received from the event and any other relevant details." While licensees can identify doses assigned for any non-tritium internal dose, dosimetry cannot say if it is unplanned/planned. The minimum recordable dose is different for each methodology. It would be reasonable to capture anything above recording level and this draft should clarify what level these unplanned non-tritium exposures need to be reported. In addition, this is very difficult to complete for fecal sampling which has an approximate turnaround time of 9 months following the end of the quarter (worker has 6 months to submit the sample, then Kinectrics needs a few months to analyze the sample). This means licensees can only provide information on results received for that quarter and not on samples submitted/assigned that quarter. This would also be a very manual process. □ This draft also requires a list of governing documents defining unplanned dose tiers and CR numbers, which may be in appropriate to include in external reports.	
Bruce Power, OPG, NB Power	3.1	Industry seeks added clarity for the phrase, "If there is an apparent change in SPI results, the licensee should provide a brief explanation in the additional details section of the data sheet." This revision implies NPPs are to provide statements on all changes. Licensees believe the CNSC's intent is only to provide insights on declining performance.	Amend to read, "If there is an apparent ~~change~~ decline in SPI results, the licensee should provide a brief explanation in the additional details section of the data sheet." Also, clarify what a "brief explanation" might actually entail.
Bruce Power, OPG, NB Power	3.2	The guidance refers to *CSA N285.0-17*. However, at least one licensee does not have this standard as part of its licensing basis. For those that do, *REGDOC-3.1.1* may become misaligned with future evolutions of the licensing basis, which has the potential to cause confusion and increase the likelihood of error.	Clarify which systems need to be included and which do not. Rather than cite a reference to a specific version of a

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			standard, the intent should be summarized.
Bruce Power, OPG, NB Power	3.2	Industry has a number of major concerns with the expanded requirements in the quarterly report on nuclear power plant pressure boundaries. Licensees request this be added as a workshop agenda item given their significant impact on licensees' Pressure Relief Device (PRD) programs. As currently written: All Class 1-6 PRDs are considered in this updated version of *REGDOC 3.1.1* rather than Safety Related System components only. Any occurrence of any pressure relief device that fails its test will be considered reportable, which is not included in the current version. This will significantly increase the number of reportable events and the nuclear safety rationale for these proposed changes is not clear to industry. Please see comments 18-22 for related concerns.	Industry urges CNSC staff to maintain the established and highly-effective requirements in the current version of *REGDOC-3.1.1* and explain what gap these proposed changes are seeking to close.
Bruce Power, OPG, NB Power	3.2	Industry is concerned with the proposed addition of bullet 3 to report any degradation of a pressure relief device other than during testing. These PB degradations of relief valves (other than during testing) will be similar to degradation to other components (break or leak of PB parts) and currently captured under bullets 1 and 2. Industry does not believe a new category is required for such degradations. As written, the clause will cause more confusion than clarity. For example, if a relief valve (RV) lifts while in service due to system upset/pressure as per design, will this be reportable? Currently, there would be an investigation when the RV was removed from the system and as-found tested (as sometimes RVs lift, as required due to system pressure as per RV design). This draft would require extensive investigation to determine the reportability and conditions that were present when the RV lifted.	Remove bullet 3 and maintain the established and highly-effective requirements in the current version of *REGDOC-3.1.1*

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Bruce Power, OPG, NB Power	3.2	Industry has similar concerns with bullet 4. Currently, only as-found tests that failed are reported (where the pressure lies between its maximum set-point pressure and the hydrostatic test pressure of the associated system). With the proposed changes, tests that fail above the maximum set-point pressure and below the minimum set-point pressure would be required to be reported to the CNSC. It's unclear whether failures above and below will be reportable.	Remove bullet 4 and maintain the established and highly-effective requirements in the current version of *REGDOC-3.1.1*
Bruce Power, OPG, NB Power	3.2	Under the current version of *REGDOC-3.1.1,* degradation-fault of a relief valve during testing is described as one that "resulted in the pressure-relief device opening during testing at a pressure which lies between its maximum set-point pressure and the hydrostatic test pressure of the associated system." In the proposed version, no such criteria are provided. In the absence of any criteria, an event may be interpreted in different ways by different utilities.	Industry urges CNSC staff to maintain the established and highly-effective requirements in the current version of *REGDOC-3.1.1*
Bruce Power, OPG, NB Power	3.2	The Guidance in this draft suggests pressure boundary degradations minor in nature (not safety significant, leaks do not exceed limits in licensing basis, causing no impairment of the system) are included in quarterly reports. Industry suggests the information provided under the current format is sufficient for quarterly reportable events (which are minor in nature). Providing detail impacts will add no value. Safety significant PB degradations are also reported under a separate clause (D.10) along with preliminary reports and detail event reports with impacts and potential impacts on the system. Therefore, this requirement is redundant.	Remove and maintain the established and highly-effective requirements in the current version of *REGDOC-3.1.1*
Bruce Power, OPG, NB Power	3.2	The language in the exemption paragraph under Guidance is unclear. Many Class 6 systems meet exemption criteria, but only a few have been formally exempted. The RSW system, for example, meets the criteria in Clause 5.2.4.2, but has never been formally exempted under the design process. Clarity is required on whether a given system has to be formally exempted, or can the principles be applied to a system that has not been formally exempt but meets the criteria? Depending on the clarity provided, pressure relief valve reporting may no longer	Maintain the established and highly-effective requirements in the current version of *REGDOC-3.1.1.*

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		be limited to safety-related systems, which would increase the number of quarterly reportable testing failures.	
Bruce Power, OPG, NB Power	3.3	The quarterly report on nuclear power plant personnel is intended to capture information related to certified workers. This includes individuals certified to operate the nuclear power plant, but could also include Authorized Health Physicists (AHPs) or class II Radiation Safety Officers (RSOs). Industry seeks to clarify that Clause #1 (and preferably, all of Section 3.3) is intended for reporting related to individuals certified to operate the nuclear power plant. There is the potential for confusion since AHPs are not shift workers and Class II RSOs may or may not be certified with respect to a facility inside or outside the nuclear power plant, which may or may not be authorized by a licence separate from the PROL.	For future drafts, industry urges staff to include Guidance that says, "The quarterly report on nuclear power plant personnel applies to all persons holding a CNSC certification to operate the NPP during the quarter and does not apply to authorized health physicists or class II radiation safety officers." Or, if the CNSC intends the quarterly report to capture information related to authorized health physicists or class II radiation safety officers, the guidance should include: "The quarterly report on nuclear power plant personnel applies to all persons holding a CNSC certification to operate the NPP during the quarter, as well as other certified personnel such as authorized health physicists and/or class II radiation safety officers."
Bruce Power, OPG, NB Power	3.3	Clause 5 proposes a change in reporting requirements with respect to hours of work exceedances from certified personnel to all safety-sensitive personnel, though it does not refer to *REGDOC-2.2.4, Managing Worker Fatigue.* CNSC oversight should be limited to the highest priority issues (exceedances of the 16 - hour daily work limit or the 8-hour daily recovery limit), for which event reporting is required as per Appendix A, Clause A.35.	Remove clause 5. Future drafts should not require licensees to list hours of work exceedances in the QRN3P, but retain the requirement to provide event reports for exceedances. CNSC staff is also urged to explicitly note that applicable hours of work limits are listed in *REGDOC-2.2.4.* This would exclude other hours of work limits such as

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			internal procedural limits or provincial legislative limits. A lack of clarity increases the potential for error and lack of timely, accurate reporting.
Bruce Power, OPG, NB Power	3.3.	Industry has concerns with draft clause 6, which requires, "a summary of simulator fidelity and system health issues including visible errors, outstanding work orders and corrective and preventative maintenance backlog, identified by priority, along with recovery plans and target dates of completion." A recurring report is not the appropriate vehicle to provide this type of information.	Remove clause 6. This information is more suitable for provision upon a formal request or during an inspection, not a recurring report.
Bruce Power, OPG, NB Power	3.3	Industry seeks additional clarity for clause 7a.	Please clarify: □ Which organization charts, including support groups, are being requested? □ For the staffing numbers – does the CNSC want total regular staff or all employment types? (i.e. temporary, contract, ETE, TERMs, etc.) □ What level within an organization is appropriate for the summary of organization changes? Changes occur very frequently at the Business Unit/Division/Department level. Industry recommends the Division level is the most appropriate. □ What is expected regarding responsibilities and reporting? For which positions?

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Bruce Power, OPG, NB Power	3.3	All of the information described in clause 7b is already being provided in quarterly reports, but not as a 5-year rolling profile. Industry sees no value in duplicating efforts to provide a rolling profile when the CNSC has existing means/agreements to produce such information specific to individual NPPs.	Remove clause 7b
Bruce Power, OPG, NB Power	3.3	Clarity is sought for some of the items related to alcohol and drug testing under clause 7d. Specifically: (a) There is no reference to *REGDOC-2.2.4, Vol II, Version 3.* (b) Reporting expectations for item "i. the random testing rate achieved" are unclear. This may also be inappropriate to include until the federal court rules on challenges to random testing. (c) Inclusion of item ii, which says, "all drugs for which testing is conducted and cut-off concentrations by specimen type (i.e., urine or oral fluid), including results of tests using lower cut-off concentrations and any special analyses of dilute specimens." (d) Privacy concerns related to item iii, which reads, "number of tests administered and results of those tests sorted by workgroup tested and testing circumstances (i.e., pre-placement applicant, pre-placement transfer, reasonable grounds, post-incident, return to work, follow-up and random)" (e) For item iv, its unclear why the CNSC would need to know "alcohol or drugs identified in verified positive tests by specimen type (i.e., breath, urine, oral fluid)." (f) The use of "dilution" in item v, which reads, "number of subversion attempts by type (e.g., refusal to test, adulteration, dilution, substitution)"	For added clarity, CNSC staff is urged to: (a) Amend the 1st sentence of Clause 7d to read, "the results of alcohol and drug testing conducted pursuant to *REGDOC-2.2.4 Vol II Version 3*, including …" (b) Remove until the issue of random testing is tested in court. Otherwise, clarify that item i is asking "yes/no" if the minimum 25% random testing rate was achieved per the requirements in *REGDOC-2.2.4, Vol II, Version 3* and not the actual percentage of completed tests from the subjected population. (c) Remove item ii for the following reasons: O "all drugs for which testing is conducted and cut-off concentrations by specimen type" -- This data is established by the CNSC in *REGDOC-2.2.4*. Licensees test for the drugs in the CNSC panel and use the cut-off concentrations they have established. There is nothing to report. O "including results of tests using lower cut-off concentrations" -- Licensees

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			would not use lower cut-off concentrations for any testing required by *REGDOC-2.2.4*. Therefore, this is not an area licensees would report to the CNSC. O "and any special analyses of dilute specimens" -- The dilute protocol in *REGDOC-2.2.4* is guidance only. Licensees are following the dilute protocol of their collection agency. There is nothing to report on since following CNSC's dilute protocol is optional. (d) It's only appropriate for licensees to report the number of tests administered by testing circumstance. The pre-placement category should not be separated as applicant vs. transfer. This could compromise individual privacy due to low numbers of testing and other data gathered by the CNSC which can be used to connect results to individuals. (e) Clarify why the CNSC needs this specific information. What benefit does it provide a regulator to know what substance an individual tested positive for? Also, there would be privacy concerns if item iii is not adjusted. (f) Amend to read, "… (e.g., refusal to test, adulteration, ~~dilution,~~ substitution). A diluted sample does not necessarily mean it was a subversion attempt. For

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			example, adding water to a sample (subversion) vs. drinking a lot of water prior to a test (lifestyle, nervousness, etc.)
Bruce Power, OPG, NB Power	3.4	Industry has major concerns with clause 8 and the cyber security requirements added to the quarterly report on operational security. Licensees request CNSC staff include cyber security reporting as a key agenda item for a pre-publication workshop with industry. Specifically, licensees: a) Believe clause 8 should refer specifically to the cyber security of "Cyber Essential Assets". b) Understand the intent of sub-bullets (a) and (d) is to ask for summaries of high-level program reviews such as audits and drills. Many facility assessment tools are very specific and large in number -- reporting these would be a significant burden. Currently, high-level reviews are conducted a few times a year and licensees believe the proposed frequency should be annual, not quarterly. c) Note that clause 8 does not have an analogue in the physical security section and the words "performance" and "posture" in sub-bullets (c) and (d) are vague. What constitutes a "cyber security posture change?" d) Note that it would not be applicable every quarter to provide a summary of results from cyber security drills as per sub-bullet (d). e) Wonder if sub-bullet (e) refers to Incident Response procedures and not to playbooks (which are numerous, highly-detailed and frequently-updated)? f) Believe sub-bullet (f) should use a graded approach, similar to clause 2.4. More clarity is required for what is meant by "…could have had cyber security related implications or consequences …"	Industry urges the CNSC to require annual (not quarterly) reporting for cyber essential elements and to ensure this REGDOC's requirements align with the recently-released *Bill C-26, An Act respecting cyber security, amending the Telecommunications Act and making consequential amendments to other Acts.* For future drafts, licensees urge the CNSC to: a) Change the first line of clause 8 to read, "for Cyber Essential Asset security, include:" b) Change the reporting frequency to annually, not quarterly, for sub-bullets (a) and (d). c) Clarify what CNSC expectations are when it asks for summaries of "performance" and "posture." d) Amend sub-bullet (d) to require a summary of significant drills and exercises annually, not quarterly. e) Clarify that sub-bullet (e) refers to Incident Response procedures.

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			f) Amend sub-bullet (f) to read, "a brief description of any situations (including the identification of cyber vulnerabilities) or events, taking into account system significance as described in *CSA N290.7*, that had or could have had cyber security related implications or consequences and which were not reported under an event report."
Bruce Power, OPG, NB Power	3.4	Clause 9, which says, "updates related to special security equipment …" is redundant. Submissions are already provided under quarterly updates on special equipment as per *REGDOC- 2.12.1 volume 1, High Security Facilities: Nuclear Response Force.*	Remove clause 9.
Bruce Power, OPG, NB Power	3.5	Industry has a many significant concerns with the increased – and often duplicate – level of reporting in the proposed annual report on radiation protection and asks for this to be discussed during a pre-publication workshop. This draft requires all the same information as the current REGDOC version plus a significant amount of additional detail with no clear, corresponding improvement to nuclear safety. This includes: □ Justification of a licensee's ALARA program by a description of all RP initiatives and planned dose reduction initiatives as well as dose-saving initiatives which were implemented. This should not be prescriptive and "any achievable" results may not always be in the form of a radiation protection initiative. □ A summary, targets and look-ahead of initiatives for the next year. □ A discussion of trends for the last five years.	Industry urges CNSC staff to remove the proposed annual report and retain the effective, well-understood requirements in the current version of *REGDOC-3.1.1.* This would be in keeping with the intent of the federal government's Red Tape Reduction Action Plan and the CNSC's own initiative to modernize Annual Compliance Reporting.

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		□ An additional dose-reporting category for forced outages, the number of units operating, number of units being refurbished, days in operation, number of outages, outage durations and median dose. □ A new report format that requires lens of eye skin dose and extremity dose data. □ All dose data presented in a histogram format, which is a time-consuming requirement. □ A requirement to report the "maximum effective dose received by workers who are not classified as NEWs." This is quite difficult to provide. It is normal for individuals to on-board as NEWs, then leave and come back as a non-NEW (or vice versa). Licensees would need to address these cases manually. □ A new requirement for average, median, and maximum numbers for whole body dose, skin dose, extremity dose, and lens of the eye dose. □ A new requirement for a maximum dose value for 5 year dose period, which is currently a maximum yearly dose. □ A new requirement for the number of staff monitored, the number of non-zero doses as well as the number of non-NEWs monitored and number of non-zero dose in this category □ A discussion of licensee's RP programs, including highlights, revisions to governance, trend analysis of corrective action process/self-assessments. This is extremely broad and administratively-intense with no clear value-added. There is no actual RPR/REGDOC requirement to perform confirmatory sampling, so why are licensees being asked to provide this? How does this align with provincial reporting requirements?	
Bruce Power, OPG, NB Power	3.5	In addition to the Major concerns noted in the previous comment, licensees believe several new requirements related to the annual report on radiation protection are unclear as written. They include: (a) The Note on page 10, which reads, "For sites with multiple reactors, the licensee shall report the data in individual annual reports for each station, as specified in their licence(s): the maximum effective dose received by workers who	Remove the additional reporting in this report and retain the effective, well-understood requirements in the current version of *REGDOC-3.1.1*. Otherwise, staff is encouraged to amend this section to:

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		are not classified as NEWs." What about those who are classified as NEWs part way through a year? (b) What is intended by sub-bullet "3 iii discrete particles" under the radiological hazard control? (c) Licensees also seek greater clarity on the new requirement for "maximum individual WB dose for the current 5 year dosimetry period." (d) A new requirement for a detailed discussion for radiological hazard control data and trends for PCEs, DRPs, and LCEs. (e) A description of "other challenges the licensee encountered during the period, and how they were addressed." (f) The new requirement to confirm sampling information, including the number of workers that qualified, the number of workers monitored, type of sampling and the number of positive samples. For each positive sample, this draft requires the result of investigation/cause, evaluation for candidates for routine bioassay program, and dose assigned for positive results. Is the intention here to report positive PAS samples in scheduled annual report instead of in unscheduled report under section A.18?	(a) Clearly say licensees with a consolidated PROL can prepare one report and clarify reporting expectations for workers who are classified as NEWs part way through a year. (b) Clarify if "discrete particles" are a subset of loose contamination events. (c) Clearly say the "maximum individual WB dose for the current 5 year dosimetry period" is only dose from the licensee, which is industry's current understanding. (d) Clarify what is expected in this section and why DRPs are considered separate from LCEs, since DRPs are a type of LCE. (e) Clarify what is meant by "other challenges." This is overly broad and more specifics are needed. (f) Clarify how positive PAS results are reported. Does it replace unscheduled reporting? If not, industry already reports positive PAS samples through preliminary unscheduled reporting. Does this apply only for TRU or other confirmatory sampling? For instance, some licensees request confirmatory sampling for Fe-55 and Sr-90 for MCR workers. What does qualified mean in this context? Does this mean the total pool of workers who performed high risk

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			alpha work? What does the number of workers monitored mean? Does this mean the workers that were selected or those that submitted the sample? The requirement to provide the number of positive results is unrealistic. As previously mentioned, there can be several months between samples being submitted and licensees receiving results. At most, licensees can provide the information on any results received for the year.
Bruce Power, OPG, NB Power	3.6	Industry seeks clarification regarding the opening sentence, which reads, "The environmental protection report shall be submitted annually and shall contain the following information from the NPP and all its related facilities:" The phrase "all its related facilities" is quite broad and there could be misalignment between facilities' interpretation of "related facilities" which could result in inconsistent reporting,	Amend to read, "The environmental protection report shall be submitted annually and shall contain the following information from the NPP and all its related facilities as defined in the EMS:"
Bruce Power, OPG, NB Power	3.6	Industry seeks clarification regarding clause 2, which reads, "a summary of the objectives of the environmental protection measures conducted in the last calendar year, and whether the objectives have been met." The objectives of an environmental monitoring or effluent/emissions monitoring program do not change from year to year, but the activities to meet the objectives may. As written, this statement is confusing and makes it difficult to provide accurate information to report.	Amend clause 2 to read, "A summary of activities conducted in the last calendar year to meet environmental protection measure objectives ~~the objectives of the environmental protection measures conducted in the last calendar year, and whether the objectives have been met."~~
Bruce Power, OPG, NB Power	3.6	Industry seeks additional clarity for clause 3. What types of updates or changes to environmental protection measures warrant inclusion since tracking minor items could be onerous? Depending on CNSC expectations, this could increase the risk	Amend clause 3 to read, "A summary of any significant updates made to the environmental protection measures, the reason for these changes, and the current

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		of inconsistent reporting and administrative efforts with no corresponding safety improvement.	timelines for the next planned periodic reviews of the environmental protection measures."
Bruce Power, OPG, NB Power	3.6	Clause 4 and sub-bullets (a) and (b) are ambiguous and confusing. Environmental action levels (EAL) are not applicable to all licensees for contaminants and EALs would be covered as a licence limit. It's important to have clear guidance as to how data should be presented in the annual EPR to ensure all licensees present consistent data to the regulator. As written, it's unclear how this bullet aligns with provincial reporting requirements. Also: □ Both sub-bullets say "at minimum" and then "where applicable." □ Reporting and monitoring requirement is triggered based on *CSA N288.5*. Does this draft mean reporting is required if monitoring/reporting is triggered based on *CSA N288.5*? Are these suggested for normally seen radionuclides in CANDU reactors? □ Since conventional (hazardous) emissions are reported based on ECA requirements – which may be revised and some reporting requirements removed in the future - the term "e.g." may be better than using "i.e." in this instance. □ For hazardous substances, this draft should say, "refer to ECA requirements." For example, the MECP has started changing/simplifying the MISA related requirements. "Loadings" may not be required to be reported any more for conventional emissions. Only reporting on concentrations maybe required in the future.	Amend bullet 4 to read, "the results of the effluent/emissions monitoring program, for both radiological and hazardous substances ~~including the hazardous substances~~ (~~i.e~~. e.g. activity concentrations, flow rates and loadings), in SI units, suitable for evaluation of compliance against ~~environmental action levels and~~ licence limits a. at minimum, the licensee shall report the following for releases to air, where applicable: tritium oxide (HTO), elemental tritium (HT), carbon-14, noble gases, radioiodine, gross alpha, and gross beta/gamma b. at minimum, the licensee shall report the following for releases to water, where applicable: tritium oxide (HTO), carbon-14, gross alpha, and gross beta/gamma c. hazardous substances to air and/or water as reported to other AHJs."
Bruce Power, OPG, NB Power	3.6	Clause 5, which requires "a summary of other government-required monitoring …" is redundant to other submissions. The annual compliance report contains the results of the monitoring performed for the year and program documents contain the methodology and technical basis for the sampling. This should not be required	Remove clause 5 since the CNSC can obtain this information from other submissions. Otherwise, clarify what information is proposed to be accessible

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		to be included in the ACR. Trend information for effluent releases is included in SPI sheets each quarter.	to the public via a web link. Additional information required is covered in program/ process documentation and environmental management system oversight meetings.
Bruce Power, OPG, NB Power	3.6	What is meant by "associated supportive variables" in clause 6?	Clarity what is meant by "associated supportive variables."
Bruce Power, OPG, NB Power	3.6	Industry has major concerns with clause 9. The wording "non-reportable, unusual or unforeseen conditions….and other findings or results" is ambiguous. Industry needs the flexibility to operate programs day-to-day without the burden of reporting "every unusual or unforeseen event or other findings or results." Currently, the CNSC is copied on all event reports, QRSPI and regulatory reporting to Authorities Having Jurisdiction (AHJs). Events and issues are already reported and any concerns can be brought to the quarterly meetings for discussion.	Remove clause 9. At a minimum, amend it to read, "a summary of reportable events and ~~non-reportable, unusual or unforeseen conditions (e.g., uncontrolled releases) that might require corrective action or additional monitoring, and other findings or results, with respect to the conduct of~~ discussion of results out of trend that might require corrective action or additional monitoring and their impact on the environmental monitoring program."
Bruce Power, OPG, NB Power	3.6	Industry has concerns with the Guidance that reads, "For item 7, include ERA predictions as well as any standards/guidelines, as applicable, to all figures where monitoring data are presented." This is an unrealistic request since there is not enough time to realize the environmental impacts from predicted activities. It is more appropriate to report this on a 5-year basis.	Amend the Guidance to read, "For item 7, include ~~ERA predictions as well as~~ any standards/ guidelines, as applicable, to all figures where monitoring data are presented."

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Bruce Power, OPG, NB Power	3.10	As per comment #12, the annual compliance report for Class II nuclear substances and radiation devices should not be included in *REGDOC-3.1.1*. It is redundant to other reporting and LCH requirements.	Remove section 3.10. LCHs should be the document that clarifies which requirements need to be submitted.
Bruce Power, OPG, NB Power	4	What is the difference between a report and a notification? If a notification can be submitted by email, why do some notifications also have a requirement for a detailed report (20b and 20d, 21)? The guidance for Section 4 says, "For notifications to the CNSC, the licensee may choose to notify using either the electronic event report forms or another appropriate means." What is an electronic report form?	Clarify the difference between a report and a notification.
Bruce Power, OPG, NB Power	4.1	Industry has a major privacy concern with clause 8, which requires "identification of persons by their full legal names and position titles affected by the situation or event, including: a. any exposure of a person to radiation"	Remove the "full legal name" requirement to protect the privacy of workers having their identities published in a publicly-available report. Otherwise, most reports would need to be treated as confidential.
Bruce Power, OPG, NB Power	4.1	In addition to the major concern above, industry seeks the following clarifications regarding the contents of preliminary event reports and notifications: a) As per sub-bullet 7c, stating causal analysis methods is not necessary for initial communications via a preliminary report and will only cause confusion since the public will not appreciate the nuances of different investigative methods. It's not significant for low-level investigations. b) Does sub-bullet 7f change what licensees report? Will it expand? How do licensees know the scope of SSCs important to safety? c) What is meant by "exposure" in sub-bullet 8a? d) Though only Guidance, industry has concern with the suggestion that "date" refers to the date when management becomes aware of the occurrence of an event.	For added clarity, CNSC staff is urged to: a) Remove 7c. b) Clarify if sub-bullet 7f will change what licensees report. c) Provide more context as to what is meant by "exposure" in 8a. d) Remove this guidance or further clarify what is meant by "date" and when the "time clock" starts. From SCR/PICA initiation? From licensee management determination?

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		If followed, this could pressure licensees to make premature reporting decisions before all of the information is known.	
Bruce Power, OPG, NB Power	4.2	Industry has significant concerns with the proposed new requirements in clauses 4-14, which are quite intrusive and often redundant. CNSC staff is urged to include this as an agenda item for a pre-publication workshop. Discussions with industry are needed to reconsider public posting requirements for detailed event reports and find the proper balance between encouraging thorough investigations and posting information for public awareness. For example: a) Clause 6 requires "a description of the role of contractor companies and their subcontractors in the event and event analysis, if applicable." This is too intrusive and infringes on the privacy of contractors and their reputations since event reports are to be publicly posted. CNSC staff can inquire about this outside of the formal reporting requirements should it be felt relevant. b) Clause 14 regarding dose calculations is overly intrusive, overlaps with DSL reporting and requires additional discussion with industry.	Remove the new requirements in clauses 4-14 and retain the existing, effective wording in *REGDOC-3.1.1* to avoid confusion. If CNSC staff members wish to have additional levels of detail, they can rightfully request the actual investigation or attend associated meetings.
Bruce Power, OPG, NB Power	4.2	The Guidance for item 9 inappropriately says the "root cause analysis … should be submitted to the CNSC."	Remove this guidance.
Bruce Power, OPG, NB Power	4.3	It's unclear what format the CNSC would like for supplemental information or how much this option would be used.	Clarify the format (email/formal letter) in which supplemental information should be submitted.
Bruce Power, OPG, NB Power	4.4	The ability to withdraw an event report is a welcome change, though licensees expect to use it rarely. However, why should an event report related to an actual or potential dose exceedance not be subject to the withdrawal process? The CNSC	Consider this item for discussion at an industry workshop prior to publication of *REGDOC-3.1.1, version 3*. Remove the

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		encourages early reporting via *REGDOC-3.1.1*. In such cases, it seems plausible that some potential dose exceedances could be reported only to have subsequent information/dosimetry results reveal the report was not warranted. Licensees should have the option to withdraw any type of event report. Also, this draft says the retraction needs to be approved by the CNSC. That means if licensees conservatively report (because of compressed timelines), they may not be able to retract even if they find an event actually wasn't reportable.	exemption related to actual or potential dose exceedances. Also, clarify the format (email/formal letter) in which a retraction request should be submitted and reconsider the retraction approval process.
Bruce Power, OPG, NB Power	App. A	Version 3 continues the practice of quoting from the regulations and providing specific reporting provisions. This can cause significant confusion for two reasons: (1) Does the text from the regulation apply or does the specific reporting provision apply? In other words, are the specific reporting provisions in addition to the quoted text, or in lieu of them? (2) The numbering is not consistent, which causes confusion among staff unfamiliar with *REGDOC-3.1.1* or the *NSCA*. (Please note that *REGDOC-3.1.1* is used routinely by hundreds of staff at each licensee to evaluate reportability of station condition records; these staff are not necessarily accustomed to, or trained on, the regulatory framework in Canada.) As an example, consider A.1: The text quotes from *NSCA*, Section 27, then provides specific reporting provisions. The numbering is clearly inconsistent, which makes it harder to use *REGDOC-3.1.1*, or to describe to users where to find the information they need. The reporting requirements are also confusing: is it necessary to report contraventions of the Act? Please note the Act is quoted, and then specific reporting provisions are provided. The reader may reasonably conclude that programmatic failures should be reported, as well as contraventions of the licence, but the reader may not realize that contraventions of the Act are reportable. This is very error-likely. While Regulatory Affairs staff fully understands that contraventions of the Act are	Remove the quoted text from the regulations from each clause of Appendix A. For clarity, cite only the relevant reporting provisions; these may be specific reporting provisions, or in some cases, the requirements of the regulations would be restated. If it is necessary to include references to the regulations—as the basis for the reporting requirements— move these references (quoted text, or simply references) to guidance. As an example, A.1 could be shortened and clarified to read, "The licensee shall report on the following situations or events: contraventions of the NSCA, programmatic failure of a program referenced in the licence, contravention of the licence." Additional information could be provided in guidance. If desired,

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		reportable, please consider that untrained users must and do use *REGDOC-3.1.1* on a daily basis.	references to the *NSCA* could be included in the guidance. This is much clearer and will help reduce the potential for error. Similar changes should be made throughout Appendix A.
Bruce Power, OPG, NB Power	App. A	While industry appreciates the proposal to allow reports to be provided (usually) within 14 days (previously 5 business days), there may be challenges with implementing the proposed change as it relates to calendar days. CNSC staff has proposed that time periods specified for reporting are calendar days (previously, it was based on business days), based on the Interpretations Act. Industry understands the effect of this change is that: (a) reports may be due on weekends but not on federal holidays (b) the "clock" does not stop for holidays. While nuclear facilities are indeed 24/7 operations, administrative support is typically provided during normal business hours five days/week. Also, why do clauses 16 and 17 have 7-day requirements when almost every other clause has 14-day requirements?	Retain the previous expectation that event reports should be submitted 5 business days after the oral report. Explain why clauses 16 and 17 have 7-day requirements when almost every other clause has 14-day requirements?
Bruce Power, OPG, NB Power	App. A	It is not clear to licensees why notifications are part of the event reporting requirements (i.e., Appendix A). The following notifications do not relate to unexpected situations: □ A.3 (authorized delegates/responsible persons) □ A.9 (notification of intent to dispose of a record) □ A.16 (notification of a planned maintenance outage)	Remove these items from *REGDOC-3.1.1*. Alternatively, they could be moved to a new appendix for notifications, allowing Appendix A to focus on

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		The information provided does not align with the expectations for event reports; these are very clearly different in nature from event reports.	events/situations. This would improve clarity and usefulness of *REGDOC-3.1.1*.
Bruce Power, OPG, NB Power	App. A	Industry seeks clarification on: a) The 2nd bullet, which calls for "immediate reporting for dangerous occurrences," though not all immediate reports are dangerous. b) What is meant by "lower significance situations"?	CNSC staff is urged to: a) Consider expanding the definitions to include "potentially dangerous" or "near misses." b) Clarify what it sees as "lower significance situations."
Bruce Power, OPG, NB Power	A.1	Industry seeks additional clarity for the following in A.1: a) The 1st bullet under examples of non-compliance that are programmatic, which says, "an item of non-compliance with a control measure …" Programmatic breakdowns imply multiple incidences. b) Regarding the references on pages 23-26: A.4 should be B.4 and a number of subsequent revisions are required. Note – a number of titles or references to regulations/acts are also missing. This could impact future trending and consistency in clause use.	For clarity: a) Remove the 1st bullet or use a better example. b) Review numbering, titles and references for accuracy and consistency.
Bruce Power, OPG, NB Power	A.4	Additional clarity is sought for guidance under 4a. As written, the guidance is contradictory when it says, "This reporting is in response to an unexpected occurrence that creates a hazard to the safe operation of the NPP" and "Reportable situations include… false alarms that activate the site nuclear emergency plan." False alarms do not necessarily create a hazard to the safe operation of the NPP. Additionally, "An event is not reportable if ... no mitigating actions were required." Also: a) The 2nd bullet is unclear when it says, "- use of abnormal or emergency operating procedures by meeting the entry conditions, including evacuation of an area." Under RPP-00047, there are abnormal conditions which require evacuation,	Clarify the guidance to decrease the potential for errors. Specifically, staff is asked to: a) Clarify if this draft requires reporting of radiological incidents or alerts. b) Clarify that false alarms are not included. c) Clarify if the use of "or" from the Interpretation Document can be reintroduced. d) Remove the bullet "~~it was felt at the site~~" under earthquake reporting.

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		i.e. tritium levels widespread, that are classified as alert or incident. Does this draft now require reporting of radiological incidents or alerts? b) The 3rd bullet is unclear when it says, "sounding the emergency alarm, mobilizing the site emergency response team (ERT) or offsite emergency responders" False alarms should not be included. c) Under "A fire is reportable if:" should there be "or" after each line as it was in the Interpretation Document? d) Under "An earthquake is reportable if:" The 1st bullet "it was felt at the site" is too ambiguous even for guidance. e) The guidance indicates that every time the ERT is mobilized, *REGDOC-3.1.1* reporting is required. This would result in reports for minor spill events that do not reach the natural environment or have spill exemption criteria in regulations.	e) Amend the Guidance to read, "An event is not reportable if: An alarm was sounded, the emergency response team responded, but no significant mitigating actions were required (e.g., minor releases that do not reach the natural environment or are exempt from MECP reporting)."
Bruce Power, OPG, NB Power	A.5	The guidance for A.5 is not clear when it says, "… occurring within the boundary of the nuclear facility even if unrelated to the operation of the NPP." Does this refer to the site boundary or the facility boundary?	Clarify what is meant by the boundary of the nuclear facility.
Bruce Power, OPG, NB Power	A.6	Industry understands the requirement for A.6 applies to workers certified to operate the nuclear power plant and not necessarily to AHPs or Class II RSOs. However, it not explicit in this draft, there is the potential for confusion since AHPs are not shift workers. Class II RSOs may or may not be certified with respect to a facility inside or outside the nuclear power plant, which may or may not be authorized by a licence separate from the PROL.	Confirm industry's understanding of this clause and provide the following guidance: "The requirement applies only to individuals certified to operate the NPP and not to Authorized Health Physicists or class II Radiation Safety Officers." Or, if the CNSC intends this requirement to apply to AHPs or class II RSOs, add guidance to read: "The requirement applies to all certified personnel, including Authorized Health Physicists and/or class II Radiation Safety Officers."

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Bruce Power, OPG, NB Power	A.8	As per *GNSCR*, Section 31(2), subsection (1) does not apply for power reactor operators (the PROL requires reporting pursuant to *REGDOC-3.1.1*). Since 31(1) does not apply, is it required to report any action that the licensee has taken or proposes to take?	Remove the text quoted from the regulations in A.8 and all other clauses. Retain only specific reporting provisions and the minimum text needed to clearly specify the reporting requirement.
Bruce Power, OPG, NB Power	A.9	Why does A.9, clause 9, include requirements under the *NSCA* that are not reporting requirements? (*GNSCR* Section 28(2)(a) and Section 28(3)). Is it intended that *GNSCR*, Section 28(3), is included in the scope of this item?	Remove the text quoted from the regulations in A.9 and all other clauses. Retain only specific reporting provisions, and the minimum text needed to clearly specify the reporting requirement.
Bruce Power, OPG, NB Power	A.16	The guidance for A.16 (b) says notification of changes to planned outage scope should include additions to scope resulting from planned inspections. Previously, some licensees have interpreted the NORU requirements to apply only in advance of a planned outage; changes to outage scope during the outage were not reported to the CNSC. However, the CNSC has now imposed an expectation to report on changes to outage scope during the outage. This is going to greatly increase the volume of reporting with no benefit to nuclear safety. Any inspection in a planned outage could result in changes to scope, whether additions or removals. Those changes are to be dispositioned as per the OCAS. What benefit does the CNSC gain from receiving reports of all changes to scope during an outage? Additionally, CSA requirements result in inspection reports being sent to the CNSC following the outage. The guidance in *REGDOC-3.1.1* is therefore even more stringent than the expectations of CSA standards that define the requirements for inspections.	Remove the guidance for (b), which reads, “This notification should include additions to outage scope, such as component repairs or replacement resulting from conducting a planned inspection during the outage.”
Bruce Power, OPG, NB Power	A.18	The proposed text for A.18 fails to discuss reporting requirements for alpha uptakes, which is a significant, missed opportunity to add much-needed clarity and address an ongoing, major issue for licensees.	Licensees request undefined reporting requirements be removed from *REGDOC-3.1.1*. If the CNSC intends to retain the requirement to report alpha uptakes, industry request a workshop

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		Currently, the interpretations document says reporting is required for "potential unplanned intake of alpha contamination by a worker as a result of licensed activities prompting a preliminary intake dose assessment." This threshold is inappropriate. As such, we request CNSC staff to explain whether it intends reporting of alpha uptakes to continue under *REGDOC-3.1.1 v3* despite the lack of any mention in the document.	before publication of version 3 so CNSC staff can: (a) Explicitly define the intent to report alpha uptakes as a specific reporting provision. (b) Define a reporting threshold that is consistent between licensees. (c) Define a reporting threshold that is commensurate with the safety significance of any such uptake. During this workshop, industry would propose the CNSC use the same 10 mrem threshold for alpha events as used for other internal uptakes. CNSC staff would continue to have visibility on all alpha events through the enhanced quarterly reporting.
Bruce Power, OPG, NB Power	A.18	Clarification is sought for: (a) The 1st bullet, which reads, "any matter or item of regulatory interest that the CNSC has previously or currently expressed interest in and/or concern." It's unclear how licensees are to know which items the CNSC previously had interest and/or concern. (b) As per previous comments, positive PAS samples have been reported through this section as unscheduled reports in the past. Has this now moved to scheduled reporting? (c) The 4th bullet, which read, "negative trends or non-conservative behaviours." This is not defined or clarified. Given the large volume of condition records captured by licensee corrective action programs, this could result in a large volume of reporting if taken literally.	CNSC staff is urged to: (a) Explain what it means by "any matter or item of regulatory interest that the CNSC has previously or currently expressed interest in and/or concern." This is quite broad, all-encompassing, and should be narrowed. (b) Confirm if PAS samples are to be treated as scheduled or unscheduled reporting.

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		(d) The 1st sentence under Guidance reads, "The licensee may submit copies of the report(s) or notification(s) prepared for other governing regulatory bodies to the CNSC as a preliminary event report." Can licensees still provide this by email as is current practice?	(c) Explain the desired intent with respect to reporting negative trends and non-conservative behaviours. (d) Confirm that licensees may still use email to "submit copies of the report(s) or notification(s) prepared for other governing regulatory bodies to the CNSC as a preliminary event report."
Bruce Power, OPG, NB Power	A.19	This clause has caused confusion between licensees and the CNSC in the past. Industry appreciates the guidance being updated (i.e. the current interpretations document refers to "malice and forethought" while this draft avoids the term "malice" and clarifies that reporting is not required for an "unintentional mistake or ignorance"). This is a clear improvement. However: (a) The guidance provides a circular definition: "misuse refers to intentional misuse." Also, the guidance is not entirely clear regarding mistaken actions. In some cases, reportability may be in doubt. For example, if a user intentionally uses the device in an inappropriate way, but is ignorant of the expectations for use or the consequences, reporting appears to be required as well as not required. Licensees don't believe it's appropriate to define or redefine "misuse" (because the term is used in legislation). Instead, industry suggests an approach that focuses on what reports are required rather than how a word is defined. (Please see suggested change). (b) The 2nd sentence under guidance says, "Violations to the alcohol or drug-related fitness for duty policy, including the use, sale, distribution, possession or presence of illegal drugs, or the consumption or presence of alcohol or cannabis at a high-security site, should be reported under this reporting provision" Possession or presence of alcohol/cannabis are not regulations and this could lead to a significant administrative burden of banned substances being detected and	For clarity, CNSC staff is urged to avoid redefining the term "misuse" and amend: (a) The opening line under Guidance to read, "Reporting is not required if the alteration or misuse has no potential to impact the protection of the environment or the health or safety of persons. Additionally, reporting is not required if the alteration or misuse was unintentional (i.e., due to mistake or ignorance). ~~The term "misuse" refers to intentional misuse and would include tampering and using something in an unsuitable or unintended way, but would not include an unintentional mistake or ignorance.~~" (b) Remove this from Preliminary Reporting. (c) Remove the statement from A.1 bullet 1a).

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		reporting during routine searches. These are station/site requirements, not regulatory. (c) The 3rd sentence under guidance says, "The discovery of a degradation or vulnerability that may permit undetected drug or alcohol use or abuse by workers, such as but not limited to quality assurance or testing errors, should be reported under this reporting provision." The same statement was used an example for reporting under A.1 bullet 1a).	
Bruce Power, OPG, NB Power	A.20	Industry seeks additional clarity on the following: □ Clause 20b, which says, "Radiation Protection Regulations (RPR): 15 (1) The effective dose limits and equivalent dose limits prescribed in sections 13 and 14 do not apply to a person participating in the control of an emergency." This is an example of something quoted in the regulations that does not appear to have any relation to reportability. What would industry report? □ In Clause 20c "Specific reporting provisions," the word "events" has been replaced by "situations or events." What is the difference between a situation and an event?	Clarify what licensees would report under Clause 20b and what the difference is between a "situation" and an "event" as per 20c.
Bruce Power, OPG, NB Power	A.22	Industry seeks clarity for: (a) The 1st sentence under guidance, which reads, "For item b), a failure to collect an individual sample where justified…" it is not clear what is meant by "where justified." (b) The Note that reads, "spills… not exceeding regulatory limits should be reported in the quarterly safety performance indicators… SPI-6, Spills." SPI-6, Spills, template includes only Category A, B, and C reportable spills and spills that have a regulatory exemption from reporting are not included in the template. Reporting spills to the CNSC that are not reportable to the MECP causes confusion and unnecessary administrative burden.	CNSC staff is urged to: (a) Add a note to the guidance that reads, "Note: Justification does not include human performance errors causing a missed sample." (b) Align guidance and SPI-6, Spills and amend the Note to read, "Note: ~~Spills and~~ release estimates for events not exceeding regulatory limits should be reported in the quarterly safety performance indicators, SPI-5, Environmental Releases- Radiological ~~and SPI-6, Spills~~ (see Appendix B)."

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Bruce Power, OPG, NB Power	A.24	Clarity is sought for item 18.(3), which reads, "Where a licensee, in the course of conducting a leak test on a sealed source or on shielding, detects the leakage of 200 Bq or more of a nuclear substance, the licensee shall (d) immediately after complying with paragraphs (a) to (c), notify the Commission that the leakage has been detected."	This section should specify this is only when leak testing is required by *NSRD* regulation or license.
Bruce Power, OPG, NB Power	A.25	According to this section, there are many more detailed requirements for reporting than in the current REGDOC. Are these new requirements or just items already required and added from the *NSRD* regulations?	Please confirm if these are new requirements or items that already required and added from the NSRD regulations.
Bruce Power, OPG, NB Power	A.26	What reporting is required if the situation or event is of low significance? Is it still required to be reported immediately?	Clarify the reporting requirements for low significance events.
Bruce Power, OPG, NB Power	A.27	Industry has questions and concerns regarding the following: a) What criteria need to be met to be considered an attempted breach? b) The requirement under item b, sub-bullet vi requires reports on "the application of any use of force." There remains a difference of opinion between some licensees and CNSC staff on what constitutes a "use of force" application. Without additional clarity and agreement on the term, there will be discrepancy and disagreement on what is to be reported. c) The phrase under guidance which says, "Licensees should assume threats are credible until law enforcement determines otherwise" is not reasonable or necessary. Licensees have the capability to determine credibility. This guidance has the potential to increase spurious reporting/unnecessary engagement with local law enforcement. d) Under subsection 29, Specific reporting provisions, sub-bullet (a) should be updated to simply say CEAs.	CNSC staff is urged to: (a) Clarify what criteria need to be met to be considered an attempted breach? (b) Remove sub-bullet vi until agreement is reached between licensees and the CNSC what constitutes a "use of force" application. (c) Remove the 1st sentence of the 2nd paragraph under guidance, "Licensees should assume threats are credible until law enforcement determines otherwise." (d) Amend sub-bullet (a) at the top of page 57 to read, "any attempted or actual cyber-attack <u>against Cyber Essential Assets</u> computer-based systems and/or subsystems that adversely impacts or potentially impacts the safety, security,

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			emergency preparedness or safeguard functions."
Bruce Power, OPG, NB Power	A.28	The two bullets under specific reporting provisions for the Annual Report for Threat and Risk Assessment are not appropriate for this document.	Remove the two bullets under specific reporting conditions: ~~"the licensee, upon their assessment that is conducted every 12 months, shall provide a summary to the CNSC of the information collected and analyzed from the previous year's assessment, and provide information about changes to the facility and surrounding community that influenced the threat and risk assessment~~ ~~• every 5 years, the licensee shall provide to the Commission a copy of the written record together with a statement of actions taken as a result of the threat and risk assessment, within 60 days after completion of the assessment""~~
Bruce Power, OPG, NB Power	A.31	This draft is missing the following statement from the interpretation document: "If all the information can be stated in the Preliminary Event Report then no Detailed Event Report is necessary."	Industry urges future drafts of this REGDOC to reinstate the phrase, "If all the information can be stated in the Preliminary Event Report then no Detailed Event Report is necessary."
Bruce Power, OPG, NB Power	A.32	Clarity is sought for the Guidance statement for 32b), which reads, "For any non-compliances with section 26 of the PTNSR, 2015, reports are required. Examples of non-compliances associated with section 26 include, but are not limited to, the use of improper package type, preparing a package for transport in a manner that	Please clarify if non-compliances to section 26 are expected to be reported against section 35(g) of the PTNSR, which is in reference to Dangerous Occurrences that may be expected to

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		was not in accordance with its manufacturing standard, loading a package with radioactive material that exceeds the capacity of the package.	lead to a safety significant situation? If the answer is Yes, industry recommends amending the PTNSR to include "section 26" in 35(g). If the answer is No, licensees will require more details on reporting provision and timelines.
Bruce Power, OPG, NB Power	A.36	Sub-bullet iv under specific reporting provisions is vague when it says, "any other conditions outlined in the public agent or peace officer authorization."	Clarify the intent of this sub-bullet with a clear statement and possible examples.
Bruce Power, OPG, NB Power	A.36	Industry seeks additional clarity for the Guidance statement, "The discharge of a firearm or special security equipment is considered a higher significance event. The police agency of jurisdiction needs to be made immediately aware of any stolen or missing firearms. These reporting provisions apply if a firearm is negligently, accidentally or unintentionally discharged on site or not, for any reason." The phrase "for any reason" raises questions about shooting range or training activities leading to a facility/course being inappropriately closed or suspended, impacting qualifications.	This guidance requires additional context to ensure it remains consistent with other jurisdictions that use and train with similar weapons.
Bruce Power, OPG, NB Power	A.37	There is a reference to the term "special equipment." While this is defined in *REGDOC-2.12.1 High Security Facilities, Volume I: Nuclear Response Force (version 2),* it is defined somewhat loosely, and warrants greater clarity to avoid misunderstandings between licensees and the regulator.	Clarify the definition of "special equipment."
Bruce Power, OPG, NB Power	App. B	Appendix B includes the Safety Performance Indicator data sheets, but does not specify whether these data sheets (format) are requirements or guidance. It appears the exact format of the data sheets may be considered a requirement. Licensees need the flexibility to adjust formatting for efficiency and clarity.	Please add text that confirms the data sheets are considered guidance.
Bruce Power, OPG, NB Power	B.1	What is considered an "apparent change" in SPI results? Is this a change to previously reported data? Or, is it a change in emissions or effluent trends?	Add a description of "apparent change."

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Bruce Power, OPG, NB Power	B.1	Similar to earlier comments, industry has concerns with the increased – and often duplicate – level of reporting for collective radiation exposure. Specifically: This draft requires a quarterly report with the same dose information as the current REGDOC as well as: number of units operating; units being "rehabilitated"; days in operation; average wb dose; median wb dose; maximum WB dose(along with workgroup and job description); outage duration; number of workers receiving non zero dose broken down between outage and online. Another category for dose reporting has also been added for forced outages. The current version of *REGDOC-3.1.1* requires PCEs by tier. This draft requires the same plus: skin dose from contamination events; SCR numbers for Tier 1 and 2; a description of events; references to the governance numbers for PCE classification. It's also broken down by unit, which is an issue since licensees do not classify PCEs in this way. Licensees generally don't calculate skin dose from PCEs. It is usually done when it exceeds a PCIR limit. If the dose estimate is < 250 mrem (minimum recordable dose), 0 mrem is assigned. Maybe this should be changed to skin dose greater than the minimum recordable dose? This draft requires all the same information as the current REGDOC regarding unplanned tritium exposures by tier, plus a separate category for non-tritium internal exposure and the recording level. It also says, "For any unplanned internal exposure other than tritium, the licensees are to provide a brief description of the event, including the radionuclides of concern, such as radioiodine, C-14, MFAP or TRU, the dose received from the event and any other relevant details."	Remove the additional, duplicate reporting from future drafts of *REGDOC-3.1.1*.
Bruce Power, OPG, NB Power	B.2	Industry seeks additional clarity for section on Personal Contamination Events. Specifically: a) The line on page 73 that says, "The licensee's current basis document(s)* that define the three PCE Tiers are …" is not needed. These are already listed in LCHs and including them here is redundant and not consistent with other SPIs. b) Is the Survey Number (instead of SCR #) sufficient for Tier 2 events? Under some licensees' procedures, SCRs are not entered for a Tier 2 PCE event unless it is greater than 10,000 cpm on the skin or 40,000 cpm on clothes or shoes.	CSNC staff is urged to: a) Remove the line and associated chart on page 73 that says, "~~The licensee's current basis document(s)* that define the three PCE Tiers are:~~" b) Clarify that a Survey Number (instead of SCR #) is sufficient for Tier 2 events.

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Bruce Power, OPG, NB Power	B.3	Similar to the previous comment, the line on page 75 that says, "The licensee's current basis document(s) that define Unplanned Dose / Unplanned Exposure Tiers events are:" is not needed. These are already listed in LCHs and including them here is redundant and not consistent with other SPIs.	Remove the line and associated chart on page 75 that says, ~~"The licensee's current basis document(s) that define Unplanned Dose / Unplanned Exposure Tiers events are:"~~
Bruce Power, OPG, NB Power	B.4	Licensees seek additional clarity on the section regarding Loose Contamination Events.	For improved clarity, licensees suggest future drafts should: □ Change the title of B.4 to "~~Loose~~ Contamination Events" □ Under definitions, replace "loose" with "removable" to align with the Notes. Amend to read, "Tier 1 event: Removable ~~(Loose)~~ or fixed… Tier 2 event: Removable ~~(Loose)~~ or fixed… Tier 3 events: Widespread removable ~~(loose)~~ **…"** □ List governing docs that classify loose contamination tiers, not unplanned dose tiers □ Provide more context for important terms and definitions. For instance: O The term "loose contamination" includes uncontrolled nuclear substances independent of whether the substance is removable or fixed. Why not just call this total contamination? O The term "widespread" uses the following definition: "contamination is found in multiple locations traceable to a

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			common source." If it was not traceable to a common source, it would not be widespread?
Bruce Power, OPG, NB Power	B.4	Similar to previous comments, the line on page 78 that says, "The licensee's current basis document(s) that define Unplanned Dose / Unplanned Exposure Tiers events are:" is not needed. These are already listed in LCHs and including them here is redundant and not consistent with other SPIs.	Remove the line and associated chart on page 78 that says, ~~"The licensee's current basis document(s) that define Unplanned Dose / Unplanned Exposure Tiers events are:"~~
Bruce Power, OPG, NB Power	B.5	Industry has a major concern with the Note regarding "related facilities." It is not practical to provide emissions and effluent data for "related facilities" that are not owned or leased by the operator. For example, on the Bruce Power site, there are other licensed facilities owned by CNL and OPG.	Amend the Note to read, "Related facilities" are those facilities owned or leased by the nuclear operator that have radiological releases to the environment that contribute to the annual total effective dose to public from the site and have licensed release limits (e.g. Derived Release Limits (DRLs)) and/or environmental action levels."
Bruce Power, OPG, NB Power	B.5	Industry seeks clarity for the following points: (a) Under Notes, is the requirement to submit effluent data in an electronic spreadsheet format (as part of the quarterly SPI reports) intended to support the NPRI-CNSC Radionuclide Data Linkages project? It appears this requirement is a duplication of efforts as the radionuclide data is already submitted to the CNSC via QRSPI reporting. (b) It is not practical to provide emissions and effluent data for "related facilities" that are not owned or leased by the operator. For example, on the Bruce Power site, there are other licensed facilities that are owned by CNL and OPG. (c) Under the Performance Indicator Data Sheet, monthly waterborne releases for the quarter (discharges to water): The DRL (Bq/year) and AL (Bq/month) should be removed from the Carbon-14 column heading. DRL (Bq/year) and AL	For future drafts, CNSC staff is urged to: (a) Add a Note to explain the need for and purpose of the electronic spreadsheet. (b) Change to, "Related facilities" are those facilities owned or leased by the nuclear operator that have radiological releases to the environment that contribute to the annual total effective dose to public from the site and have licensed release limits (e.g. Derived

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		(Bq/month) are not required for any other waterborne or airborne radionuclides. As written, this is inconsistent with format of weekly airborne releases section. This causes confusion. (d) Under the Performance Indicator Data Sheet Bruce Power, OPG, NB Power does not report airborne elemental tritium emissions, which has already been dispositioned as not required.	Release Limits (DRLs)) and/or environmental action levels. (c) Amend the waterborne Carbon-14 column heading to read: Carbon-14 ~~AL: Bq/month~~ ~~DRL: Bq/year~~ (d) Add a Note to bottom of the table that says: *Note: Reporting of airborne elemental tritium is only required for facilities where it is applicable.
Bruce Power, OPG, NB Power	B.7	Under notes and the final sentence on page 85, the current reporting form is as per the COG guide (based on WANO GL 2001-04)	Amend to read, "This SPI is intended to match the Candu Owners Group (COG) ~~World Association of Nuclear Operators (WANO)~~ performance indicator of the same name."
Bruce Power, OPG, NB Power	B.10 B.11 B.12	The Reference Period (hrs) in the table for the Performance Indicator Data sheet is not defined. Industry assumes it's the number of hours in the quarter, but seeks clarity.	Define Reference period.
Bruce Power, OPG, NB Power	B.10 B.11 B.12	The calculation for SPI 10 and 12 uses a different UEL (unplanned energy loss) than SPI 11 as SPI 11's UEL includes the High Lake Water Temperature losses (HLWT) in the calculation. So, unless there is an additional line item for UEL including HLWT in the combined data sheet, licensees don't believe SPI 10, 11 and 12 should be combined into one data sheet. However, SPI 10 and SPI 12 can be combined as they both use the same UEL.	Add a line item for UEL including HLWT in the combined data sheet

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Bruce Power, OPG, NB Power	B.17	Regarding the "Missed Standby SSTs" in the table for the Performance Indicator Data Sheet, industry assumes this should be standby safety-related systems tests. Is there a missing row for "performed" in this category?	Please clarify.
Bruce Power, OPG, NB Power	B.18	Industry does not report online and outage work orders and does this calculation online only.	Amend the final sentence of the 3rd paragraph under the Note to read, "Work orders include ~~both~~ online ~~and outage~~ work orders.
Bruce Power, OPG, NB Power	B. 19	Industry seeks clarity on the following items related to the Chemistry Index: a) Calculations: a - ai/Ai definition no longer applicable b - sum(ai)/sum(Ai) definition is the equation and does not require a specific definition as it is the same as the main definition. b) The formula for the final indicator score continues to use ai and Ai for the I/S hours and total hours respectively. The new Indicator Data Sheet uses ISi and Oi instead, even though these seem to be the same thing. Perhaps one of these variables should be changed to align with the other to prevent confusion. c) Parameters monitored: a - "Feedwater" is one word to describe the system b - Formatting..."dissolved O2" should be beside "Feedwater" and not twice under "Condensate Extraction Pump" d) Note 1: Ai is defined as "the number of hours the plant is in an operational state during the quarter, as defined by licensee-specific documentation" but note 1 defines it as "The total operating hours in the period refers to the total operating hours for the system to which the chemical parameter pertains." If the plant is in the shutdown state, but the system is in service does it count towards the total operational hours? e) Note 2: If a sample is not taken within the Station's documented sampling frequency + grace period is it considered out of specification? Note 2 indicates "Parameters that are included in the indicator but were not measured (because the monitoring capability did not exist or the measurements were not obtained during	Amend future drafts to: a) Delete ai/Ai and sum(ai)/sum(Ai) definitions. b) Make nomenclature consistent between the REGDOC text and the data sheets. c) Do not separate "Feedwater" into two words and move "dissolved O2" beside "Feedwater." d) Clarify if the plant is in the shutdown state, but the system is in service, does it count towards the total operational hours. e) Clarify the intent. f) Reword verbiage to reinforce performance only reported for unit operating conditions and reported values are applicable until shutdown. Could completely delete listed statement. g) Clarify if a parameter is out of specification and then misses the sampling frequency, does this count the time as double.

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		the period; e.g., an instrument not available) will be reported as being out-of-specification. In cases where the parameter is out-of-specification due to the unavailability of a facility, the parameter shall be reported as being out-of-specification." This suggests that as long as licensees obtain the sample within the quarter - and it is within specification – they would not consider it out of specification. Notes 4 and 5 do not adequately clarify this. f) Note 3: "If a parameter is in (or out of) specification before a shutdown, it is considered to remain in (or out of) specification once the system is back in service until it is re-analyzed and found to be otherwise." This statement is not accurate as system conditions and specifications are completely different when the unit/system is shutdown than when operating. The system condition during and after a unit start-up are likely different state than prior to shutdown, so considering the parameters to be in (or out of) specification from shutdown to start-up would be an inaccurate representation. Also, if a parameter is analyzed out of specification before an outage but during the outage it is analyzed within specification, is the parameter I/S or O/S upon start-up from the outage? g) If a parameter is out of specification and then misses the sampling frequency, does this count the time as double? (e.g. Every hour that a parameter is out of spec and outside frequency would be 2 hours?) h) Note 4: Performance must be reported for all time periods when system is considered to be in an operational state as defined by licensee-specific documents." This statement is not accurate as "Operating State" for each system as defined in the CYS/CCP documents may not align with the required calculations by the CNSC. In some cases, different parameters for the same system are calculated based on different operating conditions. i) Note 7: "For multi-unit sites..." should be under Note 8 as Note 7 calculation is for individual parameters. j) Performance Indicator Data Sheet: Line in table separates IS# and O# for each parameter (formatting). k) In the definitions, the ai seems to be in a different font and possibly bold (formatting).	h) Reword verbiage to clarify that reported performance is based on given CNSC requirements per system and specific parameters. i) Move listed statement from Note 7 to Note 8 or delete. j) Remove line (merge cells) for each parameter to be clear same parameter covers both IS# and O# (formatting). k) Ensure common fonts are used for readability.

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Bruce Power, OPG, NB Power	B.20	Industry seeks clarity on the following items related to the Chemistry Compliance Index (non-GSS and GSS): a) **Parameters monitored, Non-GSS conditions**: [Gd] in moderator (unit in poison outage **OR** SDS2 actuated) - **OR** was added. If SDS2 is actuated, it will be a poison outage - i.e. these two items are the same and not mutually exclusive). b) **Parameters monitored, GSS conditions**: Parameters listed apply for **OPGSS** and **RBGSS**, but do NOT apply when the Moderator system is drained during an outage (**DGSS**). DGSS is still considered a GSS, but in this case the MCG system parameters are the control parameters. c) **Performance Indicator Data Sheet**: a - Line in table separates IS# and O# for each parameter (formatting). b - ECI pH and hydrazine are parameters to be included, but are in Unit 0. Current table does not have column for Unit 0 at either station. d) Under definitions, add Emergency Core Cooling (ECC) to recognize that's what ECI is called at some stations.	For clarity, staff is urged to amend future drafts to: a) Remove "or" from [Gd] in moderator line. b) Clarify condition or add in parameters to cover for DGSS. c) Remove line (merge cells) for each parameter to be clear same parameter covers both IS# and O# (formatting) and add columns for Unit 0A and Unit 0B. d) Add Emergency Core Cooling (ECC) to the definitions.
Bruce Power, OPG, NB Power	B.21	The requirement to report for contractors is new and has not historically been combined with utility data. Combining contractor and utility data will provide information that is not historically comparable and does not accurately reflect safety performance of Nuclear Power Plant employees.	Industry urges CNSC staff not to combine utility and contractor data and amend its definition section to read, "Exposure hours are the total number of hours of employment of all NPP employees ~~workers~~ for each member utility for each reporting period. NPP employees include regular, full-time or part-time employees as well as temporary employees who are employed for the duration of time and paid directly by the reporting utility. ~~This includes regular hires, direct contractors / augmented / supplemented staff and~~

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			~~contractors working through a separate company~~."
Bruce Power, OPG, NB Power	B.21	The new requirement regarding the number of injuries resulting in restricted work is not value-added information.	Amend the definition of restricted work to read, "An employee is deemed to be working in a restricted capacity due to a work-related injury or illness resulting in the employee being unable to perform their regular permanent job (i.e. is accommodated in an-other role), or is unable to work the normal time period of their pre-injury or illness work days (i.e. reduced hours of work)."
Bruce Power, OPG, NB Power	B.21	It is not clear what "lost days" means in the definition section. Calendar Days Lost are included when work-related and medically-supported (as per COG GL 2012-01 Rev 0). A normally scheduled day off is not counted as a work-related "lost day." The definition for Exposure Hours has also changed to "hours" in this draft. This affects all of the rate calculations.	For accuracy, CNSC staff is urged to: a) Amend the 1st paragraph to read, "The accident severity rate is the total number of working days lost for lost time injuries per 200,000 person hours worked at an NPP." b) Amend the 4th paragraph under definitions to read, "A lost-time injury is an injury or illness resulting in lost working days beyond the date of injury as a direct result of an occupational injury or illness incident. A fatality is not considered a lost-time injury." c) Amend the 6th paragraph to read, "Lost days are the number of ~~calendar days~~ working days that the employee is unable to work beyond the day of injury/illness recommended by a Health

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			Care Professional. Lost time ends as of the date that the worker is deemed fit to work either full or restricted work, or up to a maximum of 180 calendar days for any individual case." d) Remove the 3rd paragraph under NOTES, which reads, ~~"The Canadian federal reporting requirement for severity includes shifts not worked. For example, suppose a person is hurt on the last regularly scheduled shift and then is away for two days that were regularly scheduled off. If the person would not have been able to work those two days, but was able to return to work on the first regularly scheduled day, those two days would be counted as lost days."~~
Bruce Power, OPG, NB Power	B.22	Industry seeks clarity on a number of items related to the Radiological Emergency Performance Index, Specifically: (a) Industry seeks improved verbiage in the 4th paragraph under Notes to clarify what must be included in the REP index and the extent of activities to which "evaluated" vs "assessed" applies. The draft separates "drills evaluated by ERO" and "exercises and other simulated emergencies that are assessed." The scope of evaluated/unevaluated activities is unclear given this wording. Clarity is important to comply with the new wording regarding "performance criteria." The draft wording could be interpreted as only applicable to "other simulated emergencies that are assessed" and excludes activities of "emergencies, drills evaluated by ERO, and exercises." (b) Clarity around the draft wording which reads, "The ERO consists of, but not limited to, the following ..." is open-ended and unclear what licensees are required	Amend: (a) The 4th paragraph to read, "~~Emergencies, drills evaluated by the emergency response organization (ERO), exercises and other simulated emergencies that are assessed and that interact~~ Emergencies and evaluated simulated emergencies that are a part of drills, exercises, or practical evaluation opportunities for which the emergency interacts with one or more of the following facilities or functions shall be included in this indicator. Evaluated shall be taken to mean as observed and

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		to include. Additionally, there are new items added to list that are not consistent with *REGDOC-2.10.1 version 2*. For clarity, this draft should reference the licensee's emergency preparedness plan which has already been reviewed by CNSC. (c) Clarity regarding the "Number of performance opportunities scheduled" as it is outside scope of the definition given in B.22 and is not required to calculate the REP Index. As emergencies are included in B.22 and not scheduled, these cannot be included in the measure.	assessed by the emergency response organization with comparison to the specified performance criteria." (b) Amend the 5th paragraph to read, "~~The ERO~~ Emergency response facilities and functions, as specified in the licensee's emergency preparedness plan consist~~s~~ of, but not limited to, the following ~~facilities and functions~~:" (c) Amend the data sheet to read, "Number of performance opportunities completed is the total number of emergencies and evaluated simulated emergencies~~, drills evaluated by the ERO and exercises~~ that are a part of drills, exercises, or practical evaluation opportunities, excluding training, during the quarter." Industry also requests: □ CNSC staff provide the rationale for requiring the "Total number of designated ERO positions." □ The following be added, "Pre-determined dates shall be used to measure the number of performance opportunities scheduled"
Bruce Power, OPG, NB Power	B.23	Industry seeks clarity on the following items: (a) The Purpose statement has an apparent conflict with the title and understood intent of the SPI, i.e. intent is only participation in ERO delivered drills. The term	Amend: (a) The Purpose to read, "To track the participation of emergency response organization (ERO) personnel in

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		'events' can be understood to mean an actual emergency or Operations specific training (non-ERO). (b) Use of "events" under Calculation and the 3rd paragraph under Notes. (c) The terms 'Total available ERO personnel' or 'Total number of qualified key ERO personnel' are not needed and could lead to confusion. (d) Under the Data Sheet, the 'Total number of designated ERO positions' is outside scope of the definition given for B.23 and not required to calculate the ERO Drill Participation Index. This number will rarely differ in QRSPI as changes to ERO positions are uncommon. (e) Request clarity and consistency of verbiage in the instruction, definitions of (A) and (B), and percentage participating on data sheet.	proficiency-enhancing drills, exercises, or ~~events~~ practical evaluation opportunities within a nuclear power plant." (b) The Definition to read, "The percentage of the total ~~available~~ number of ERO personnel fulfilling designated ERO positions who have participated in proficiency-enhancing drills, exercises, or practical evaluation opportunities ~~or events~~ during the quarter." A = number of ERO personnel fulfilling designated ERO positions that have participated in a ~~qualifying~~ proficiency-enhancing drill, exercise, or practical evaluation opportunity~~, or event~~ during the quarter." The 3rd paragraph under notes to read, "Multiple assignees to a given designated ERO position may each be counted for their individual participation in performing the designated ERO position at different times in the same proficiency-enhancing drill, exercise, or practical evaluation opportunity ~~or event~~ during the quarter." (c) Remove 4th paragraph: ~~"Total available ERO personnel" and "Total number of qualified key ERO personnel" are equivalent.~~"

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			(d) For the Data Sheet: a. provide the rationale for 'Total number of designated ERO positions. b. Amend the 1st paragraph to read, "Submit the total number of ERO personnel fulfilling designated ERO positions and the number that participated in ~~qualifying~~ proficiency-enhancing drills, exercise, or practical evaluation opportunities ~~or events~~ at the nuclear power plant during the quarter." c. Amend the 3rd paragraph to read, "Number of ERO personnel fulfilling designated ERO positions that ~~are participating~~ have participated in a qualifying drill, exercise, or practical evaluation opportunity~~, or events~~ during the quarter (A)" d. Amend the 4th paragraph to read, "Total number of qualified ~~key~~ ERO personnel fulfilling designated ERO positions during the quarter (B)" e. Amend the 5th paragraph to read, "Percentage of participating qualified ~~key~~ ERO personnel (A/B)*100"
Bruce Power, OPG, NB Power	App. C	There is no reference in Appendix C for Components Important to Safety (CIS)	Based on the guidance in *REGDOC-2.6.1*, NPP's are required to report on CIS. Therefore, licensees suggest adding additional guidance in this draft for CIS.

REGDOC-3.1.1, *Rapports à soumettre par les exploitants de centrales nucléaires*, version 3

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Bruce Power, OPG, NB Power	C.3.1.1	The predicted reliability table format is captioned as "Table C.2 Predicted Reliability" in versions 2 and 3. In version 3, Section 3.1.1 references the table, but incorrectly calls it "table B.2" rather than "table C.2."	Amend the 1st sentence to read, "…as to the target (see table C.2)."
Bruce Power, OPG, NB Power	C.3.1.3	The sentence following table C.6 says, "This data is included to provide … of class III power… and emergency or qualified power systems…" This sentence is applicable only to table C.4, and not table C.6 (which applies to all systems important to safety).	Delete the sentence following table C.6.
Bruce Power, OPG, NB Power	C.3.1	*I*ndustry has concerns with bullet 5, which says, *"* an explanation of changes in the predicted reliability of the system from the predicted reliability reported in previous years." As written, the expectation seems to be that all changes must be provided with an explanation, though industry believes this was only intended for declining/negative performance.	Amend to read, "an explanation of declining performance ~~changes~~ in the predicted reliability of the system from the predicted reliability reported in previous years."
Bruce Power, OPG, NB Power	App. D	The titles of Section 4.2.1, 4.2.2 and 4.2.3 are all the same.	Consider a main heading for that section, "Irradiated fuel post-irradiation examination" and then subheadings for 4.2.1, 4.2.2 and 4.2.3 that better clarify what info should be there. May need to clarify if there is a difference between 4.2.2 and 4.2.3
Bruce Power, OPG, NB Power	App. D	In table D.4, under the category "4.1.4 Trapped debris or debris fretting marks," there are two items: "4.1.4 a) All observations" and "4.1.4 b) Significant observations." For 4.1.4 a) does this mean "all" or "all other" (i.e. all observations that are not significant")? Historically, licensees have been reporting numbers as though 4.1.4 a) means all "other*"* observations.	To align with licensees' historical understanding, amend 4.1.4 a) to read, "All other observations."
Bruce Power, OPG, NB Power	Glossary	Industry has concerns with the following new definitions and ask CNSC staff to discuss them during a pre-publication workshop:	Licensees request CNSC staff include the following definitions as discussion items in a pre-publication workshop and:

Organisation	Section ou para	Commentaires	Modifications proposées
		a) The new definition for "**significant fuel damage**" should be changed to refer to "safety limits" instead of "fitness for service limits." Also, it is not clear how 1% would be calculated. The definition for "serious process failure" also refers to significant fuel damage and needs to be addressed to make sure licensees can assess serious process failures correctly and not impact unit restart. b) The proposed change to the definition of "**serious process failure**" also appears to be more in line with AOO acceptance criteria. c) The proposed, expanded definition for "**Structures, systems and components (SSCs) important to safety**" that replaces "safety related systems.	a) Amend the definition of "significant fuel damage to read, "An event or situation that leads to fuel failure resulting in release of fission products ~~brought the fuel (>1%) outside of its fitness for service limits.~~" b) Clarify the intent of the change. Currently, some licensees perform a subset of AOO-related analysis, but this new definition implies all AOO analysis is now required as a contingency. c) Clarify the intent of the draft definition for SSCs, which currently reads, "Systems of a reactor facility that are associated with the initiation, prevention, detection or mitigation of any failure sequence and that have an impact on reducing the possibility of damage to fuel, associated release of radionuclides or both."