

April 24, 2024

The Canadian Nuclear Association (CNA) appreciates the opportunity to comment on draft REGDOC-2.3.4, Operations Programs for Reactor Facilities. The CNA has approximately 100 members, representing over 76,000 Canadians employed directly or indirectly in exploring and mining, uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation.

Our comments were prepared after discussion with our members who have extensive experience in developing and implementing Operations Programs. Detailed comments are contained in tables submitted directly by our members; however, CNA would like to highlight several key concerns.

1) Large Power Plant bias:

- The document is very specific to existing large reactors (specifically CANDU) and does not consider the fact that Canada will likely deploy multiple reactor technologies, especially Small Modular Reactors (SMRs) in the future.
- The document utilizes titles and roles that may not be used in smaller reactors which may use a multi-disciplinary approach to non control room activities as well as use different titles and terminology.

The CNA would advise the CNSC to make the document technology neutral so that it can be easily applied to the variety of technologies Canada is likely to use in the future.

2) Undefined Terms

- The terms "Operating Duty Managers" and "Senior Facility Manager" are not defined in the CNSC framework. Section 2.3.1 seems to combine the roles and responsibilities of several existing positions but does not align with the current structure which makes the section unclear and confusing. This could impact current operations organizational structures.
- In addition, as Canada deploys new SMR technologies, industry is unlikely to have "qualified duty managers" with significant experience with the new technology. Previous experience with a different reactor type combined with significant training with the new reactor should suffice.

3) Duplication and expansion of requirements:

- Some of the requirements are already in other regulatory requirements. In those cases, this REGDOC should refer to those documents rather than repeat/duplicate the requirements. Industry has found that repeating requirements can lead to confusion and different interpretations. As an example, the reporting and requirements for responding to a serious process failure are already captured in REGDOC 3.1.1 as well as existing licence conditions.
- Many guidance sections provide examples, but it is unclear if these are requirements or just examples. Industry has found that over time examples can be interpreted as requirements if not clearly stated as example.



- 4) Industry has a major concern with the requirement in Section 5.1 to minimize the use of Operator Aids. Industry feels that this requirement is going entirely in the wrong direction and that the use of Operator Aids should be encourage where appropriate and as long they are directly taken from the operating documentation and reviewed at the same time as the operating documentation. Operator Aids can help remove complexity from certain processes and reduce the risk of human error.

In conclusion, the CNA believes the draft REGDOC requires revision to avoid confusion and significant impact on current operational structures. Our members look forward to further discussions with CNSC staff on REGDOC 2.3.4

Sincerely,



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Canadian Nuclear Association