

RD-327 Nuclear Criticality Safety / *Sûreté en matière de criticité nucléaire*  
 Comments received from public consultation / Des commentaires reçus dans le cadre du processus de consultation

Comments received during first round (Dec. 23, 2009 to Mar. 23, 2010) / Des commentaires reçus dans la première période (du 23 décembre 2009 au 23 mars 2010):

	Section	Name	Organization	Organization Type	Comment
1	12.3.1	aniket pant	Cameco Fuel Manufacturing	Industry	Need to add (as per ANS 8.19); except I prefer the use of SHALL to assign responsibility for criticality safety: Management shall assign responsibility and delegate commensurate authority to implement established policy. Responsibility for nuclear criticality safety shall be assigned in a manner compatible with that for other safety disciplines. Each individual, regardless of position, shall be made aware that nuclear criticality safety in his work area is his responsibility
2	preface	Dean Taylor	New Brunswick Power Nuclear	Industry	The third paragraph of CMD-09-M64 that provides exemplars that indicate this RD is not applicable to Power Reactors. The CMD should provide some clarity on applicability to power reactors.
3	preface	Dean Taylor	New Brunswick Power Nuclear	Industry	A statement of applicability should be added to an early section of the document. It is not readily apparent that this document applies to power reactor operations until some reading of the document and interpretation is done.
4	2.1.1.4	Dean Taylor	New Brunswick Power Nuclear	Industry	The only criterion used for determining if a full criticality safety program is required is the mass of fissionable material. The scale or requirement of a criticality safety program should be risk based. Natural uranium fuel requiring an advanced reflector (non abundant and contained outside of the processes involved with handling, transport and storage) does not have the same criticality risk as advanced fuels (enriched) with naturally abundant moderator (light water).
5	11.0	Dean Taylor	New Brunswick Power Nuclear	Industry	I believe the title of this section and the sections itself to be ambiguous. It appears to provide the requirements for handling, transport and storage of fuel outside of light water reactors. This section therefore implies that section 2.1.1.2 is not applicable to power reactors with advanced moderators. Clarification on the applicability to advanced moderator reactors should be included. If the purpose of this section is to provide guidance on the applicability of this document to ex-core criticality control at all nuclear reactor facilities then it should be expanded and provide clarification based on fuel composition since the term 'Light water reactor fuel' is subject to interpretation.