

**TU 06374
PICA 15-6229**

November 24, 2015

Mr. Brian Torrie, Director General
Regulatory Policy Directorate
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario
K1P 5S9

Dear Mr. Torrie:

Subject: NB Power Comments on DIS-15-02 “Review of CNSC Documentation on the Security of Nuclear Material”

The purpose of this letter is to provide NB Power’s comments on DIS-15-02 “Review of CNSC Documentation on the Security of Nuclear Material”. NBP has collaborated with our peers to review the proposed regulatory document in detail.

NBP is supportive of this initiative to streamline the process of ensuring security for nuclear material. There are some concerns that require further discussion. Comments have been provided (Attachment 1) recommending changes for improving the overall regulatory process.

NB Power appreciates the opportunity to provide comments on this regulatory document and is prepared to clarify our comments and concerns. If you require additional information, please contact Scott Demmons at 506-659-6557 or SDemmons@nbpower.com.

Sincerely,



Brett Plummer
Site Vice President and Chief Nuclear Officer

BP/SD

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- cc.** Ben Poulet, Pierre Bélanger, Lisa Love-Tedjoutomo, Bruno Romanelli (CNSC - Ottawa),
consultation@cnsccsn.gc.ca
CNSC Site Office
Trent Martin, Chris Fields, Al MacDonald (NBP)

Attachment:

1. Industry comments on CNSC Discussion paper DIS-15-02 "Review of CNSC Documentation on the Security of Nuclear Material".

Industry comments on CNSC Discussion paper DIS-15-02 "Review of CNSC Documentation on the Security of Nuclear Material".

Document section/ excerpt of section	Industry issue	Suggested change(if applicable)	Major Comment/ request for clarification ¹	Impact on industry if major comment
	General Comment – both G-208 & G-274 are guidance documents.	Need to clarify shall and may language. Guidance documents should not contain shall statements.	Major	
G-208 2.1.3	1. While using an adequately maintained vehicle for the transport of nuclear material is an expectation, CNSC staff feel that guidance on the inclusion of measures to assure adequate vehicular maintenance is outside of CNSC expertise. Therefore, it is proposed to remove this guidance.	PLGS agrees to change.	Minor	
G-208 2.1.3	2. To better match industry terminology, the term "security monitoring room" is being proposed for use when referencing a transport security control centre.	PLGS agrees to change.	Minor	
G-208 2.1.3	3. Satellite and global positioning systems are now capable of providing continuous tracking and monitoring capability. Therefore, CNSC staff are proposing to add guidance on their use.	Confirm CNSC have expertise regarding satellite/GPS (similar to proposal #1). Page 8 already contains guidance.	Minor	Confirm this is guidance only.
G-208 2.1.3	4. To allow for flexibility as well as electronic submissions, CNSC staff propose removing guidance on submission type and format (e.g., size of paper, header and footer content, etc.).	PLGS agrees with change.	Minor	
G-208 2.1.3	5. To ensure alignment with current CNSC regulatory document standards, it is proposed to make several administrative changes to G-208 content, including updating CNSC contact information, links to other documentation and general document format.	PLGS agrees with change.	Minor	
	General Comment – is G-274 not redundant with the development of the CNSC document – <i>Licence Application Guide: Licence to Operate a Nuclear Power Plant?</i>			
G-274 2.2.3	1. As a result of updates to the <i>Nuclear Security Regulations</i> , the following items in G-274 should be updated	PLGS agrees with change.	Minor	

	a. The term “guard” should be replaced with “officer” or “member of nuclear response force” as applicable.			
	b. The frequency of security drills should be changed from every six months to monthly	Align with Nuclear Security Regulations already in effect.	Minor	
	c. A new section called “Vital areas” should be added to remind stakeholder to include a description of proposed measures to meet requirements in a licence application	PLGS agrees with change.	Minor	
	d. A new section called “Supervisory awareness program” should be added, asking that a licence application include a description of the proposed measures to instruct all supervisors to recognize behavioral changes in a licence application.	Practical? CNSC be requested to produce a cost-benefit.		
G-274 2.2.3	2. Regulatory document RD-363, <i>Nuclear Security Officer Medical, Physical, and Psychological Fitness</i> , has been published since the last revision of G-274. Therefore, G-274 should be updated with a new section called “Fitness of nuclear security officers”, reminding licensees to include a description of the proposed plan for fitness testing in accordance with RD-363, as part of the security information of their licence application.	Redundant if already contained in RD-363	Minor	
G-274 2.2.3	3. As technology has changed, a description of secure communication for nuclear response forces, including secure radio communications and secure backup communication, should be included.	PLGS agrees with change. Align with G-208 guidance.	Minor	
G-274 2.2.3	4. To allow for flexibility as well as electronic submissions, CNSC staff propose removing guidance on submission type and format (e.g., size of paper, header and footer content, etc.).	PLGS agrees with change.	Minor	
G-274 2.2.3	5. To ensure alignment with current CNSC regulatory document standards, it is proposed to make several administrative changes to G-208 content, including updating CNSC contact information, links to other documentation and general document format.	PLGS agrees with change.	Minor	

¹ Please identify whether the comment is a major comment or a request for clarification