

OPG Comments on CNSC Discussion Paper

DIS-15-02: "Review of CNSC Documentation on the Security of Nuclear Material," G-208: "Transportation Security Programs for Category I, II or III Nuclear Material," and G-274: "Security Programs for Category I or II Nuclear Material or Certain Nuclear Facilities"

| # | Document Section/ Excerpt of Section | Industry Issue | Suggested change <i>(if applicable)</i> | Major Comment/ Request for Clarification ¹ | Impact on Industry, if <i>major comment</i> |
|----|--|---|--|---|---|
| 1. | Discussion Paper 15-02 2.2.3, Item 4 | This item is to "allow for flexibility as well as electronic submissions." With respect to a report that is prepared in accordance with G-274 and G-208, and which typically contains prescribed information, there does not appear to be any provision for submitting such a report to the CNSC by electronic means with encryption. | Permit the submission of reports prepared in accordance with G-274 and G-208 and which contain prescribed information, to be submitted electronically using appropriate means of encryption. | Request for clarification. | |
| 2. | DIS -15-02 section 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. | Industry agrees to change. | | Minor | G-208 2.1.3 |
| 3. | DIS -15-02 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. | Industry agrees to change. | | Minor | G-208 2.1.3 |
| 4. | DIS -15-02 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.). | Industry agrees with change. This comment is also linked to comment number 1 regarding encryption | | Minor | G-208 2.1.3 |
| 5. | DIS -15-02 2.1.3 | Industry agrees with change. | | Minor | G-208 2.1.3 |

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| | 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. | | | | |
| 6. | DIS -15-02- 2.13 bullet 3 | Guidance on Satellite and GPS systems are to be added to the document. Without knowing the nature of the guidance, OPG is unable to comment on its suitability. There is a concern that current installed systems may not be compatible if G208 Guidance is too prescriptive. | Provide clarity on the nature of GPS guidance. | Request for clarification. | |
| 7. | DIS -15-02 section 2.2.3 Recommended changes to G-274 1.c A new section called "Vital areas" should be added to remind stakeholders to include a description of proposed measures to meet requirements in a licence application | | It is suggested the new section called "Vital Areas" be specific to access control and delay – re section 14.1 of the Nuclear Security Regulations. | Request for clarification. | |
| 8. | DIS -15-02 section 2.2.3 Recommended changes to G-274 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. | Communication devices are already described following the guidance provided in section 4.2.6 of G-274. Clarification is requested on the intent change for this section. | | Request for clarification. | |
| 9. | G-274 General | General Comment – is G-274 | | | |

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| | | not redundant with the development of the CNSC document – <i>Licence Application Guide: Licence to Operate a Nuclear Power Plant?</i> | | | |
| 10. | DIS -15-02Section 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 a. The term “guard” should be replaced with “officer” or “member of nuclear response force” as applicable. | Industry agrees with change. | | Minor | |
| 11. | DIS -15-02 section 2.2.3 | b. The frequency of security drills should be changed from every six months to monthly | Align with Nuclear Security Regulations already in effect. | Minor | |
| 12. | DIS -15-02 section 2.2.3 | 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 | Industry agrees with change. | Minor | |
| 13. | DIS -15-02 section 2.2.3 bullet 2 | 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 | Industry agrees with this change | Minor | |

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| | | plan for fitness testing in accordance with RD-363, as part of the security information of their licence application. | | | |
| 14. | DIS -15-02 section 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. | The requirements for secure communication should be documented at a very high level allowing the licensees to implement the requirement in the most effective way See | Minor | |
| 15. | DIS -15-02 section 2.2.3 bullet 5 | 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.). | Industry supports the change. | Minor | |
| 16. | DIS-15-02 section 5 | 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. | Industry agrees with alignment with G-208. | Minor | |
| 17. | G-274 4.7 Security Systems, technical | Repetitive of 4.3.1 Protected | Sections 4.3.1 and 4.7 | Request for | |

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| | devices and equipment | Areas | to be combined into one section for ease of providing information. | clarification. | |
| 18. | G-274 4.5 Access and identification systems | Duplication of information required in section 4.3.1 Protected Areas and section 4.7 Security Systems | Section 4.5 to be integrated with sections 4.3.1 and 4.7 | Request for clarification. | |
| 19. | G-274 Appendix, Item 3, Confidentiality and security | This section describes providing the CNSC with correspondence concerning the security program description, i.e., prescribed information, by mail. There is no provision for submitting this type of information by electronic means using an appropriate means of encryption. | Provide capability to submit prescribed information by electronic means | Request for clarification. | |
| 20. | G-274 Appendix, Item 5, Revising the security program description | <ol style="list-style-type: none"> Revisions to the security program description are undertaken every 5 years or when requested by the CNSC (per REGDOC-3.1.1). Item 5 is silent with respect to frequency of security program description revisions Item 5 indicates that for changes to the security program description, a single, complete, copy of | <ol style="list-style-type: none"> It is considered appropriate that the guide for preparing the security program description include information related to the frequency of revisions. It is suggested to include the same | Request for clarification. | |

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| | | <p>the new version of the security program description be provided to the CNSC for approval. This is inconsistent with current practice, whereby – other than a complete revision to the security program description - a change to a specific element of the program is provided to the CNSC for review, with a commitment to include this particular change in the next complete revision of the security program description.</p> <p>3. Item 5 indicates that the licensee must first obtain CNSC approval of the proposed changes to the security program description. The Licence Conditions Handbook requires a written notification Prior to Implementation before making changes. As per the LCH, such written notifications are submitted 30 days prior to planned implementation. In a case where notifications made Prior to Implementation</p> | <p>wording as found in REGDOC-3.1.1, or to at least refer to the REGDCO for frequency of revisions.</p> <p>2. It is suggested to revise this Item to permit submission of individual elements of the security program that are being proposed to change, for CNSC approval, and which will then be incorporated in the next complete revision.</p> <p>3. Provide consistent wording to address the need of obtaining prior "CNSC approval" before implementing changes to the program.</p> | <p>Request for clarification.</p> <p>Request for clarification.</p> | |

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| | | <p>have been made and the 30 day period has not resulted in any comments from the CNSC, is it correct to assume that prior CNSC approval has been granted? (Historically, there have been situations like this, where the absence of CNSC comments was interpreted to mean that CNSC approval has been obtained.)</p> | | | |

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