



Review of CNSC Documentation on the Security of Nuclear Material

G-208, Transportation Security Programs for Category I, II or III Nuclear Material

G-274, Security Programs for Category I or II Nuclear Material or Certain Nuclear

Discussion Paper DIS-15-02

September 2015



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This document can be viewed on the CNSC website at nuclearsafety.gc.ca. To request a copy of the document in English or French, please contact:

Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
CANADA

Tel.: 613-995-5894 or 1-800-668-5284 (in Canada only)

Facsimile: 613-995-5086

Email: info@cnsccsn.gc.ca

Website: nuclearsafety.gc.ca

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Preface

Discussion papers play an important role in the selection and development of the regulatory framework and regulatory program of the Canadian Nuclear Safety Commission (CNSC). They are used to advise the public and stakeholders of the CNSC's intent to commence review of a published regulation or regulatory document and to solicit early public feedback.

The use of discussion papers early in the regulatory process underlines the CNSC's commitment to a transparent consultation process. The CNSC analyzes and considers preliminary feedback when determining the type and nature of changes to be implemented to its regulatory framework.

Discussion papers are made available for public comment for a specified period of time. The CNSC considers all feedback received from this consultation process in determining its regulatory approach.

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Executive Summary

The Canadian Nuclear Safety Commission (CNSC) is mandated under the *Nuclear Safety and Control Act* to regulate the use of nuclear energy and materials to protect health, safety, security and the environment, and to implement Canada's international commitments on the peaceful use of nuclear energy; and to disseminate objective scientific, technical and regulatory information to the public. As part of accomplishing this mandate, the CNSC is currently reviewing the content of the following two published guidance documents:

- G-208, *Transportation Security Programs for Category I, II or III Nuclear Material*
- G-274, *Security Programs for Category I or II Nuclear Material or Certain Nuclear Facilities*

Both of these documents were published in March 2003 and are due for a periodic regulatory review. After an initial review of the documents, CNSC staff concluded that the guidance in both of them is still largely relevant, and that only minor changes would be needed to bring the documents up to current regulatory standards.

This discussion paper seeks feedback on the material contained in G-274 and G-208 from licensees, the Canadian public and other stakeholders. It also outlines proposed changes to the material in G-274 and G-208 and seeks comments on these suggested modifications. The CNSC will consider all feedback received during this consultation process as it updates and integrates the material in these two documents into its modernized regulatory framework.

Review of CNSC Documentation on the Security of Nuclear Material

1. Introduction

The CNSC's regulatory document framework refers to documents that detail its approach to regulating the nuclear industry. This framework classifies all existing documents and document projects according to the following categories: regulated facilities and activities; safety and control areas; and other areas of regulatory interest.

This framework facilitates licensee and public access to all applicable CNSC regulatory expectations. Documents in this framework are periodically reviewed, and are reissued according to the CNSC's regulatory framework plan.

The CNSC is currently reviewing the following two guidance documents in the framework:

- G-208, *Transportation Security Programs for Category I, II or III Nuclear Material*
- G-274, *Security Programs for Category I or II Nuclear Material or Certain Nuclear Facilities*

This paper summarizes the CNSC's proposed changes to the guidance in G-208 and G-274. The CNSC considers these changes to be minor, and intends to solicit feedback on the material in these two documents as well as the proposed changes. All feedback will be considered as the material in both documents is updated and integrated into the CNSC's regulatory document framework.

2. Description of proposed changes

2.1 G-208, *Transportation Security Programs for Category I, II or III Nuclear Material*

2.1.1 Purpose of G-208

Regulatory guide G-208 helps applicants for a CNSC licence to transport Category I, II or III nuclear material prepare and submit a written transportation security plan that meets the requirements of section 5 of the *Nuclear Security Regulations*.

2.1.2 Scope of G-208

G-208 describes:

- the information that should typically be included in the transportation security plan referred to above
- the transport security measures that should be taken into account when developing the transportation security plan
- how the transportation security plan should be handled in order to meet requirements related to confidentiality and national security

Other federal requirements related to the transport of Category I, II or III nuclear material, such as those pertaining to packaging, documentation and safety markings, can be found in the CNSC *Packaging and Transport of Nuclear Substances Regulations* and Transport Canada's *Transportation of Dangerous Goods Regulations*.

2.1.3 Recommended changes to G-208

CNSC staff have noted the following on current G-208 content:

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.
2. To better match industry terminology, the term “security monitoring room” is being proposed for use when referencing a transport security control centre.
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.
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.).
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.

2.2 G-274, *Security Programs for Category I or II Nuclear Material or Certain Nuclear Facilities*

2.2.1 Purpose of G-274

G-274 helps applicants for a CNSC licence, in respect of Category I or II nuclear material – other than a licence to transport – or a nuclear facility consisting of a nuclear reactor that may exceed 10 MW thermal power during normal operation, prepare and submit the security information to be included with the application. The submission of this information is pursuant to the *Nuclear Safety and Control Act*.

2.2.2 Scope of G-274

G-274 describes:

- the security information that should typically be included with the application for any licence referred to above
- how the security information may be organized and presented in a separate document (hereinafter called the security program description), to assist the CNSC in reviewing and processing the application
- administrative procedures to follow when preparing, submitting or revising the security program description

2.2.3 Recommended changes to G-274

CNSC staff have noted the following on current G-274 content:

1. As a result of updates to the *Nuclear Security Regulations*, 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.
 - b. The frequency of security drills should be changed from every six months to monthly.
 - 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.

- 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.
2. Regulatory document RD-363, *Nuclear Security Officer Medical, Physical, and Psychological Fitness*, 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.
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.
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.).
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.

3. Conclusion

In their initial review of the documents, CNSC staff concluded that the guidance in G-208 and G-274 is still largely relevant, and that only minor changes would be needed to bring the documents up to current regulatory standards.

4. Public input

The CNSC welcomes feedback on G-208 and G-274, along with the proposed changes to content outlined in this discussion paper.

The CNSC expects that this proposal would result in minimal overall change to licensees’ current levels of administrative and operational burden.

Feedback received will help inform the CNSC while updating the content of both documents to be included in the 2.12 - Security series of its regulatory framework.

5. How to participate

Please submit your comments or feedback to:

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, Ontario K1P 5S9
Fax: 613-995-5086
Email: consultation@cnsccsn.gc.ca

Please indicate clearly that you are commenting on discussion paper DIS-15-02.

References

1. Canadian Nuclear Safety Commission (CNSC), G-208, *Transportation Security Programs for Category I, II or III Nuclear Material*, Canada, 2003.
nuclearsafety.gc.ca/pubs_catalogue/uploads/G208_e.pdf
2. CNSC, G-274, *Security Programs for Category I or II Nuclear Material or Certain Nuclear Facilities*, Canada, 2003.
nuclearsafety.gc.ca/pubs_catalogue/uploads/G-274_e.pdf