

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

RE: DIS-16-05, Human Performance

TRIUMF would like to submit the following comments on the discussion paper DIS-16-05, Human Performance.

Q4. Do you agree with the elements of a human performance program listed above? Are there items that you would add to or remove from the list above? Please explain.

TRIUMF suggests adding “Problem/Nonconformity Reporting and Resolution” to the list of elements of the Human Performance Program. Human Performance can be the cause of a problem and as such it is important to identify the causal factors and root causes of the problem and develop corrective and preventive actions.

Q6. Do you think that the requirement to have a human performance program should be applied using a graded approach to all CNSC-licensed facilities and activities? If so, what might this graded approach look like?

TRIUMF agrees that a graded approach in the application of human performance programs should be taken. Any regulatory standard could take the format of the CSA N286-12 document with generic requirements for all types of facilities and then specific requirements for each type of facility. As an example, a High Energy Reactor facility would have very detailed specific requirements for Fitness for Duty while a Research Facility might very few requirements in this area.

Q7. Which type of human performance program (a formal program or otherwise) is most appropriate for the types of nuclear facilities most relevant to your comments, and why?

These comments are relevant to the “managed set of interlaced activities and initiatives” model of human performance program. As a licensee with limited budget and human resources it would not be feasible to have a formal documented program. Licensees already have a documented Management System which already, or with minor improvements, contains the required elements of the human performance program described in section 5 of the discussion paper.

Sincerely,

Philip Jones
Manager, Training and Development