

**Comments on the Oct 2011 Version of RD/GD-99.3**

	<b>Oct 2011 RD/GD-99.3 Section</b>	<b>Organization</b>	<b>Reviewer's Comment</b>	<b>Reviewer's Proposed Change</b>	<b>CNSC Response</b>
1.	General	OPG	It should be noted that OPG has no additional comments on RD/GD-99.3		Comment noted.
2.	General	Winnipeg Regional Health Authority	It is my belief that if RG/GD-99.3 is approved by the Commission Tribunal as written it will cause an undue, onerous burden on public hospital facilities.		The Scope (section 1.2) of RD/GD-99.3 has been modified to clarify the intended application of this document to Class II facilities. Hospitals and cancer treatment centres are explicitly exempt.
3.	General	Winnipeg Regional Health Authority	This new document is more stringent than when the documents were separate documents (i.e. RD-99.3 & GD-99.3). At that time, GD-99.3 Section 2.1 talked about certain Class II licensees being exempt. The 2nd sentence, 3rd paragraph in Section 2.1 of GD-99.3 stated "For example, certain Class II licensees, such as hospital nuclear medicine facilities and cancer treatment centres, by the size and nature of the nuclear materials and activities they engage in, may not need to have a formal public information and disclosure program." That language has disappeared from RD/GD-99.3 when it actually ought to have been amplified ("certain Class II licensees" was quite vague, why not spell out PET Cyclotron and Radiation Therapy facilities?).		The Scope (section 1.2) of RD/GD-99.3 has been modified to clarify the intended application of this document to Class II facilities. Hospitals and cancer treatment centres are explicitly exempt.
4.	General	Winnipeg Regional Health Authority	It is my belief that if RG/GD-99.3 is approved by the Commission Tribunal as written it will cause an undue, onerous burden on public hospital facilities.		The Scope (section 1.2) of RD/GD-99.3 has been modified to clarify the intended application of this document to Class II facilities. Hospitals and cancer treatment centres are explicitly exempt.
5.	General	Winnipeg Regional Health Authority	RG/GD-99.3 as currently proposed will cause an undue, onerous burden on public hospital facilities and should be amended such that Class II licensees operating PET Cyclotron and/or Radiation Therapy facilities in public hospitals should be exempt.		The Scope (section 1.2) of RD/GD-99.3 has been modified to clarify the intended application of this document to Class II facilities. Hospitals and cancer treatment centres are explicitly exempt.
6.	General	CNA	CNA members are included among the Class I and II nuclear facilities, uranium mines and mills that are subject to the proposed requirements and guidance. Our members are committed to open, effective public communication and have considerable experience in this area. So we recognize that there is much to consider before the proposed requirements and guidance can be put into practice.		Comment noted.
7.	General	CNA	While a number of our 2010 December 17 comments have been addressed in the revised document (RD/GD-99.3), there are some points that we would like to reinforce, or raise in light of the recent revisions. Attached is a listing of key points for your consideration in finalizing the Requirements and Guidance for Public Information and Disclosure document (RD/GD-99.3).		Comment noted. The points are reviewed in this table.

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8.	General	CNA	In our 2010 December 17 correspondence, CNA members recommended that the types of information to be shared be clarified and that phrases like "unplanned events", "other incidents" and "information and reports of interest to the public for routine and non-routine situations, events and activities" be defined. Section 5, Part 1 of the CNSC's dispositioning document indicates that clarity will be provided in the glossary of terms, but these terms do not appear in the revised glossary.		The term "event" has been added to the glossary. The term "incident" is not used in this version of RD/GD-99.3
9.	General	CNA	Terms like "situations" and "events" need to be defined for practical purposes, but also as they relate to existing guidance on the Reporting Requirements for Operating Power Plants - S-99, where these terms are defined and the information is reported to the CNSC for a different purpose (i.e., to ensure that nuclear power plants are operating safely). As the CNSC indicates in their dispositioning document, "Reporting requirements to the CNSC are different from the public information requirements in RD-99.3, which are determined by the target audience".		The terms "event" and "situation" have been added to the glossary of RD/GD-99.3. The term "incident" is not used in this version of RD/GD-99.3  Although RD-99.1 and RD/GD-99.3 have been developed in parallel, and both can be used for different forms of NPP reporting, the documents are intended to stand alone and be used independently of each other.
10.	General	CNA	In our 2010 submission, we recommended that the relationship between the Requirements and Guidance documents and other related guidance be clarified. This would include the relationship between RD/GD-99.3 and the other documents in the RD/GD-99 series of documents. For example, if the "situations" and "events" defined in RD/GD-99.1 have bearing on RD/GD-99.3, it should be clarified. RD/GD-99.1 applies to nuclear power plants, so the non-nuclear power plant licensees would need to be made aware of the connection between RD/GD-99.3 and that document.		The terms "event" and "situation" have been added to the glossary of RD/GD-99.3. The term "incident" is not used in this version of RD/GD-99.3  Although RD-99.1 and RD/GD-99.3 have been developed in parallel, and both can be used for different forms of NPP reporting, the documents are intended to stand alone and be used independently of each other.
11.	General	CNA	The CNSC's dispositioning document indicates agreement that "it is not the intent of the document to prescribe the public release of sensitive information, such as security related information and trade secrets or scientific, technical, commercial, financial or labor relations information", but this is not clarified in the revised document.		Guidance in section 2.3.2 has been updated to include this information.

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12.	General	CNA	<p>The CNSC's dispositioning document indicates in section 32 that the document "has been revised to strike a balance between the factors", which are to include the complexity of the lifecycle and activities of the nuclear facility, the risks to the public and the environment and the level of public interest; however, we note that such balance has not been explicitly stated in either section 2.1 or section 2.2.3 of RD/GD-99.3. RD/GD-99.3 should reflect in both sections 2.1 and 2.2.3 that an appropriate balance should be struck between the factors described in both sections.</p>		<p>No change is proposed as a result of this comment.</p> <p>Section 2.1 deals with "complexity of the lifecycle and activities of the nuclear facility, the risks to the public and the environment and the level of public interest;" as is shown in the following text from section 2.1:</p> <p>"The public information program and its disclosure protocol shall be commensurate with the public's perception of risk and the level of public interest in the licensed activities, which may be influenced by the complexity of the nuclear facility's lifecycle and activities, and the risks to public health and safety and the environment perceived to be associated with the facility and activities.</p> <p>.</p> <p>.</p> <p>The public information program and disclosure protocol should be developed taking into consideration:</p> <ul style="list-style-type: none"> <li>• the type of facility and activities being regulated</li> <li>• the risks to public health, safety and security, and the environment posed by the facility or activity</li> <li>• the level of public interest or concern"</li> </ul> <p>Similar to above, section 2.2.3 states:</p> <p>"Efforts taken by licensees and licence applicants to obtain public and media views should be commensurate with the complexity of:</p> <ul style="list-style-type: none"> <li>• the level of public interest they generate</li> <li>• the design, construction and operation of the nuclear facility and activities being licensed</li> <li>• the risks to the health and safety of persons and the environment associated with the facility and activities" </li></ul>

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13.	1.2	Winnipeg Regional Health Authority	<p>According to Minute 110 of the 10,11 AUG 2011 Commission Meeting, CNSC staff indicated that RD-99.3 would be selectively applied in the case of Class II licensees. According the RD/GD-99.3 document that was published after the AUG Commission meeting, Section 1.2 "Scope", there is nothing to suggest that RD/GD-99.3 will be selectively applied in the case of Class II licensees (for instance PET Cyclotrons or Radiotherapy departments in a public hospital). In fact, the very first sentence in Section 1.2 states "This regulatory document applies to Class I and Class II nuclear facilities and to uranium mines and mills." and the very first sentence in Section 2.1 "Overview" states "All licensees and licence applicants of Class I and Class II nuclear facilities and uranium mines and mills shall develop and implement a public information program that includes a disclosure protocol." Call me a skeptic but I find it very hard to believe that once RD/GD-99.3 is approved by the Commission that CNSC staff from the Accelerators and Class II Facilities Division would then selectively apply a Regulatory Document that did not address selective application explicitly in that document.</p>		The Scope (section 1.2) of RD/GD-99.3 has been modified to clarify the intended application of this document to Class II facilities. Hospitals and cancer treatment centres are explicitly exempt.
14.	1.2	London Health Sciences Centre	<p>1.2 Scope This regulatory document applies to Class I and Class II nuclear facilities and to uranium mines and mills. It defines the CNSC's requirements for public information programs and disclosure protocols and related documentation as they relate to licensed activities.</p> <p>Should be changed.</p>	This regulatory document applies to Class I and Class II nuclear facilities except brachytherapy machines, radioactive source teletherapy machines, and particle accelerators with beam energies of less than 50 MeV that are capable of producing nuclear energy (e.g. medical linear accelerators) and to uranium mines and mills. [The risk from the excepted items is so low that it is 'below regulatory concern'.] It defines the CNSC's requirements for public information programs and disclosure protocols and related documentation as they relate to licensed activities.	The Scope (section 1.2) of RD/GD-99.3 has been modified to clarify the intended application of this document to Class II facilities. Hospitals and cancer treatment centres are explicitly exempt.

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15.	1.2	CNA	The scope of the document has also been broadened by including statements such as "the public's perception of risk" (section 2.1) and "perceived risk to health, safety and the environment" (section 2.2.4), which may be very different than the actual risks to health, safety and the environment posed by the licensed facilities, and "the level of public interest in the licensed activities" (section 2.1) and "target audiences' information interests" (section 2.3.1). We note that in the previous draft of RD-99.3, the CNSC used the phrase "that may be of interest to the public" in describing the types of information to be communicated to the target audience.		<p>No change is proposed as a result of this comment.</p> <p>One of the purposes of establishing a public information program is to try and address knowledge gaps between the actual risk a facility poses to the public, and the level of risk the public perceives a facility to have. If a facility has a very low level of risk to the public, but is perceived by the public to be a 'risky' facility, then the public information program of the facility should strive to narrow the gap between the actual risk and publicly perceived risk.</p>
16.	1.3	Winnipeg Regional Health Authority	Section 1.3 of RD/GD-99.3 "Relevant legislation" includes references to NSCA 9 (b) and C2NFPER 3 (r). When one looks up the actual references, we see that NSCA 9 (b) refers to Commission Objectives (as opposed to licensee obligations) and C2NFPER 3(r) refers to the Public Information program required in Application to Construct a Class II nuclear facility – Section 3 does not address on-going operation of a Class II facility. I have commented on this previously and am of the opinion that my comment was not addressed at all (See Dispositioning RD-99.3 Comments, Part 1, Comment # 46). It would have made more sense to amend C2NFPER to require licensees to have an on-going Public Information and Disclosure Program and then create the regulatory document to address the specifics instead of creating the regulatory & guidance documents to address something that is not required by C2NFPER.		<p>RD/GD-99.3 is being developed so that it can be referenced in licences for mandatory purposes to cover operation.</p> <p>While the Class II Nuclear Facilities and Prescribed Equipment Regulations do not explicitly address public information programs of operating Class II facilities, section 9(b) of the NSCA is very clear that one of the objectives of the CNSC is "to disseminate objective scientific, technical and regulatory information to the public concerning the activities of the Commission and the effects, on the environment and on the health and safety of persons, of the development, production, possession and use... &lt;of nuclear energy, substances, prescribed equipment and prescribed information&gt;"</p> <p>RD/GD-99.3 is a positive step forward to strengthen this objective, as it will ensure facilities develop and maintain a public information program as appropriate.</p> <p>Updating C2NFPER or other regulations would be considered in the future if deemed necessary.</p>

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17.	1.3	London Health Sciences Centre	All these provisions deal with facts and with actual risks. In contrast, this document focuses more on perceptions than reality, an approach completely inappropriate for a body (CNSC) tasked with the following Mission: "The Canadian Nuclear Safety Commission regulates the use of nuclear energy and materials to protect the health, safety and security of Canadians and the environment" (emphasis added), not to protect the perception of health, safety and security.		<p>No change is proposed as a result of this comment.</p> <p>One of the purposes of establishing a public information program is to try and address knowledge gaps between the actual risk a facility poses to the public, and the level of risk the public perceives a facility to have. If a facility has a very low level of risk to the public, but is perceived by the public to be a 'risky' facility, then the public information program of the facility should strive to narrow the gap between the actual risk and publicly perceived risk.</p>
18.	2.1	London Health Sciences Centre	<p>(In section <b>2.1 Overview</b>), paragraph 4:</p> <p>The public information program and its disclosure protocol shall be commensurate with the public's perception of risk and the level of public interest in the licensed activities, which may be influenced by the complexity of the nuclear facility's lifecycle and activities, and the risks to public health and safety and the environment perceived to be associated with the facility and activities.</p>	<p>This should be rephrased:</p> <p>"The public information program and its disclosure protocol shall be commensurate with the risks to public health and safety and the environment actually associated with the facility and activities. The level of public interest in the licensed activities, which may be influenced by the complexity of the nuclear facility's lifecycle and activities, and the risks to public health and safety and the environment perceived to be associated with the facility and activities, also need to be considered when developing this public information program."</p>	<p>No change is proposed as a result of this comment.</p> <p>One of the purposes of establishing a public information program is to try and address knowledge gaps between the actual risk a facility poses to the public, and the level of risk the public perceives a facility to have. If a facility has a very low level of risk to the public, but is perceived by the public to be a 'risky' facility, then the public information program of the facility should strive to narrow the gap between the actual risk and publicly perceived risk.</p>

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19.	2.1	Bruce Power	Statements such as "the public's perception of risk" and "perceived to be associated with" are very vague and impossible for Licensees to know or reasonably be aware of. The public's perception of risk may also be very different than the real risk. These expectations are unreasonable, and will likely be impossible for licensees to meet and should be deleted.	Delete such expectations and limit the expectation to information that is "known to be of public interest" as stated in section 2.3.1	<p>No change is proposed as a result of this comment.</p> <p>It is understood that the "the public's perception of risk" is a qualitative measure, and impossible to measure with 100% accuracy, however one of the purposes of establishing a public information program is to try and address knowledge gaps between the actual risk a facility poses to the public, and the level of risk the public perceives a facility to have. If a facility has a very low level of risk to the public, but is perceived by the public to be a 'risky' facility, then the public information program of the facility should strive to narrow the gap between the actual risk and publicly perceived risk.</p> <p>RD/GD-99.3 provides guidance on how to define and engage target audiences (including members of the local community, key opinion and political leaders, community and media groups, interveners, and any identified (and possibly affected) Aboriginal groups in order to gain an understanding of the "public's perception of risk".</p>
20.	2.1	CNA	The CNSC's dispositioning document indicates that the document "will be revised for consistency using the phrase "where the public has an interest to know". However, in section 2.1 of RD/GD-99.3, the CNSC has instead utilized phrases such as "where the public has indicated an interest to know" and "target audiences affected by and interested in the licensed facilities and activities", which have a lower threshold and are broader than the phrase "where the public has an interest to know".		<p>No change is proposed as a result of this comment.</p> <p>One of the purposes of establishing a public information program is to try and address knowledge gaps between the actual risk a facility poses to the public, and the level of risk the public perceives a facility to have. If a facility has a very low level of risk to the public, but is perceived by the public to be a 'risky' facility, then the public information program of the facility should strive to narrow the gap between the actual risk and publicly perceived risk.</p>

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21.	2.1	CNA	<p>The statement in section 2.1 that “the public information program and its disclosure protocol shall be commensurate with the public's perception of risk and the level of public interest in the licensed activities, which may be influenced by the complexity of the nuclear facility's lifecycle and activities, and the risks to public health and safety and the environment perceived to be associated with the facility and activities” seems to be contradicted by the statement in section 2.2.3 that “once the target audience's concerns have been identified, only those concerns related to the CNSC-licensed activities should be considered. For example, layoffs in office staff or parking details may very well be of interest to the target audience, but are not related to the CNSC licensed activities - therefore, these would not be part of the public information program and disclosure protocol.” The first statement broadens the scope to a point where little is excluded.</p>		<p>No change is proposed as a result of this comment.</p> <p>The public information program as described in RD/GD-99.3 is intended to address the public's desire for information as it relates to licensed activities. Non-licensed activities are outside the scope of the public information program described in RD/GD-99.3</p> <p>Section 2.2.3 gives examples of things that the public may want to know about, but since the examples are not part of the CNSC licensed activities, the licensee would not be obliged to report on them. This is consistent in both sections 2.1 and 2.2.3.</p> <p>Although RD/GD-99.3 sets out the minimum reporting requirements, there is nothing to prevent a licensee from including additional materials and information in their public disclosure protocol as they see appropriate.</p>
22.	2.2.2	Bruce Power	<p>The expectation to include a “broad and inclusive interpretation of “persons living in the vicinity”” could easily become very large and unmanageable if groups such as students, seasonal residents, visitors, etc. are to be included.</p>	<p>Limit the expectation to a reasonable and manageable target audience.</p>	<p>No change is proposed as a result of this comment.</p> <p>It is expected that the public information program of a licensee should ensure that information reaches as many interested parties as possible.</p> <p>RD/GD-99.3 encourages the use of multiple communications vehicles to enhance public understanding of the information, such as a Web site, social networking, press releases, internal newsletters/intranets, posters or other print material. Where applicable, the preferred option is to post the information on the licensee's or licence applicant's Web site – which inherently can reach a large target audience</p>



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23.	2.2.2	CNA	The CNSC's dispositioning document indicates that a phrase in section 2.2.2 will be changed to "the CNSC encourages licensees and licence applicants to employ a broad and inclusive interpretation of "persons living in the vicinity" to ensure that information reaches as many interested parties as possible". However, this is the wording that was originally included in section 2.2.2. We would like to recommend, once more, that the wording be changed to "the CNSC encourages licensees and licence applicants to employ a reasonably broad and inclusive interpretation of "persons living in the vicinity" to ensure that information reaches all interested parties", in recognition of the inability to foresee "all interested parties".		No change is proposed as a result of this comment.  It is expected that the public information program of a licensee should ensure that information reaches as many interested parties as possible.  RD/GD-99.3 encourages the use of multiple communications vehicles to enhance public understanding of the information, such as a Web site, social networking, press releases, internal newsletters/intranets, posters or other print material. Where applicable, the preferred option is to post the information on the licensee's or licence applicant's Web site – which inherently can reach a large target audience
24.	2.2.3	London Health Sciences Centre	In section 2.2.3 Public and Media Opinion, paragraph 5, it states: Efforts taken by licensees and licence applicants to obtain public and media views should be commensurate with the complexity of: <ul style="list-style-type: none"> <li>the level of public interest they generate</li> <li>the design, construction and operation of the nuclear facility and activities being licensed</li> <li>the risks to the health and safety of persons and the environment associated with the facility and activities</li> </ul>	This should be rephrased to ensure that the correct priority (i.e. one based on actual risks, not perceived risks) is taken: "Efforts taken by licensees and licence applicants to obtain public and media views should be commensurate with the magnitude of the risks to the health and safety of persons and the environment associated with the facility and activities. They may also be influenced by: <ul style="list-style-type: none"> <li>the level of public interest they generate</li> <li>the complexity of the design, construction and operation of the nuclear facility and activities being licensed"</li> </ul>	No change is proposed as a result of this comment.  The suggested wording does not address the need to address public interest linked to the needs of the target audience, regardless of risk.
25.	2.2.5	London Health Sciences Centre	On a more grammatical note, in:  <b>2.2.5 Public disclosure protocol</b> The public information program shall include a public disclosure protocol describing the information and the medium of disclosure in regards to information and reports of interest to the public. Items of interest to the public may include include routine and non-routine situations, events and activities.  The word 'include' is duplicated (in the last sentence).		Agreed. Duplicated word has been removed.
26.	2.3.2	Bruce Power	The list of examples includes several items that will likely not be able to disclosed publically due to confidentiality provisions or proprietary concerns, such as labour disputes, changes to facility designs, impacts on facility operations, etc.	Ensure the public disclosure expectations do not infringe upon other legal constraints licensees must, or need, adhere to for legal or business reasons.	Section 2.3.2 has been updated to include this text.

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27.	2.3.2	CNA	In section 2.3.2 the following sentence requires clarification "In developing the protocol, licensees and licence applicants should adhere to the communication strategies and products documented in their public information program and disclosure protocol."		Agreed. The text "and disclosure protocol" has been removed from the end of the sentence. It is a redundancy that requires clarification.

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28.	2.3.2	London Health Sciences Centre	<p>In section 2.3.2 Guidance for a public disclosure protocol, the bullet points in paragraph 5 should undergo major revisions:</p> <p>1) The first one:</p> <p>2) The second point:</p> <p>3) The third one:</p> <p>4) The fourth one:</p> <p>5) The fifth one:</p> <p>6) And the sixth one:</p> <p>7) In addition, the seventh point:</p> <p>8) Likewise, the eighth point:</p>	<p>1) significant operational developments such as labour disputes and expansion or changes in facility design (no change)</p> <p>2) events with offsite effects or which could result in public interest and concern or media attention</p> <p>Is sufficient, as it covers any radiation significant aspects by its use of the phrase: 'offsite effects', i.e. where there is an actual impact on the public</p> <p>3) fires (no change)</p> <p>4) impact of natural events such as earthquakes, floods, lightning (no change)</p> <p>5) serious vehicle or industrial accidents (no change)</p> <p>6) planned and unplanned significant interruptions to facility operations, such as interruptions of power generation for nuclear power plants and isotope production for radioisotope production facilities</p> <p>Should all be removed, as they do not relate to radiation risk and are exactly the type of irrelevant information that is used by anti-nuclear groups (etc.) to raise false fears about the use of ionising radiation-associated technology</p> <p>7) routine and non-routine releases of radiological and hazardous materials to the environment should either be rephrased:</p> <p>"routine and non-routine releases of radiological and hazardous materials to the environment, where such releases could have a significant impact on the public"</p> <p>or simply removed, as the concept is covered in the second point.</p> <p>8) unplanned events, including those exceeding regulatory limits could either be removed for the same reason, or rephrased</p> <p>"unplanned events that approach or exceed regulatory limits"</p>	<p>General response: These are all examples of areas of potential public interest that can be considered. The items in the list, including the items below should be considered in that light.</p> <p>2) no change proposed. The public may have an interest in an event that may not have an actual impact.</p> <p>6) Has been amended to read "...interruptions of facility operations, such as disruption of isotope production."</p> <p>Note: Power generation interruption would be covered by other agencies or regulators.</p> <p>7) No change proposed. The public and CNSC need to be aware of releases to the environment, many of which are requirements of other regulators.</p> <p>8) No change proposed. Some unplanned events such as those that impact the public health and safety, and environment may have public interest. These are all examples of areas of potential public interest that can be considered.</p>

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29.	2.3.3	Bruce Power	The expectation that licensees shall inform the CNSC of public disclosures seems unnecessary and unreasonable since this information is, by definition made available to the public, and is therefore readily available to CNSC staff. This would amount to double reporting.	Remove this expectation.	No change is proposed as a result of this comment.  This is already included in the reporting program as a notification to the CNSC. The CNSC should be made aware of any disclosures so that it may respond to public inquiries.
30.	Glossary	Bruce Power	Inclusion of the definition of "Management System" as one of the Safety and Control Areas (SCAs) is inconsistent since all of the SCAs aren't defined. The SCAs should be defined in another document as appropriate.	Remove definition of "Management System".	No change is proposed as a result of this comment.  The document provides guidance in the Overview (Section 2.1) stating that the program should be managed. It does not require all the SCAs be included in the public information and disclosure program.
31.	General	CNA	Reference to the December 17, 2010 comments letter (attached) Reference previous comments table (#3662636)		The items are being addressed in this document.