

Request for Information on the Proposed Implementation of REGDOC-1.1.3, *Licence Application Guide: Licence to Operate a Nuclear Power Plant*

1. Preface

This document provides additional context on a proposed regulatory document. Information provided is the result of a preliminary analysis. The Canadian Nuclear Safety Commission (CNSC) welcomes comments on this document as well as on the proposed regulatory document itself.

Comments could include additional information on the regulatory document's implementation, potential impacts or potential alternative approaches that meet the document's safety objectives. Should stakeholders decide to submit impact estimates, the CNSC encourages them to clearly state assumptions and provide enough detail to allow an independent observer to understand how the estimate was derived.

The CNSC will consider comments received. In fulfilling its mandate as a federal regulator, the CNSC must also consider values and principles that are difficult to quantify with a dollar value. It must also give consideration to fulfilling its responsibility under the *Nuclear Safety and Control Act* to disseminate objective scientific and regulatory information. In all cases, safety is the CNSC's top priority.

All comments received will become part of the public record.

2. Background

Regulatory document REGDOC-1.1.3, *Licence Application Guide: Licence to Operate a Nuclear Power Plant* is part of the CNSC's reactor facilities series of regulatory documents, which also covers licence application guides for nuclear power plant (NPP) licences for other lifecycle stages (for example, licence to prepare a site and licence to construct an NPP).

The information in IAEA Safety Guide No. GS G 4.1, *Format and Content of the Safety Analysis Report for Nuclear Power Plants* was taken into account in developing this document. REGDOC-1.1.3 is more specific to the Canadian context; for example, it provides references to CNSC regulatory documents and CSA Group standards.

3. Objectives

REGDOC-1.1.3 identifies the information to be provided in support of an application for a licence to operate an NPP. It sets out requirements and guidance for safety and control measures, identifies the information that should be included in the application and provides instructions for completing the application and submitting it to the CNSC.

By following the information in REGDOC-1.1.3, applicants will submit the appropriate information to demonstrate that they are qualified and will make adequate and reasonable provisions to undertake the activity to be licensed.

When the Commission grants a licence, the safety and control measures described in the licence application and the documents needed to support those safety and control measures will form part of the licensing basis.

4. Regulatory approach

CNSC staff will use REGDOC-1.1.3 to assess licence applications for proposed new reactor facilities and for licence renewals for existing facilities.

Applicants and licensees are encouraged to consult, early in the process, with CNSC staff. CNSC staff can provide facility or activity-specific guidance to assist with the licence application.

Guidance contained in this document exists to inform the applicant, to elaborate further on requirements or to provide direction to licensees and applicants on how to meet requirements. It also provides more information about how CNSC staff evaluate the information during their review of licence applications.

Licensees are expected to review and consider guidance; should they choose not to follow it, they should explain how their chosen alternate approach is at an equivalent level of safety and meets regulatory requirements. An applicant or licensee may put forward a case to demonstrate that the intent of a requirement is addressed by other means and demonstrated with supportable evidence.

A graded approach, commensurate with risk, may be defined and used when applying the requirements and guidance contained in REGDOC-1.1.3. The use of a graded approach is not a relaxation of requirements. With a graded approach, the application of requirements is commensurate with the risks and particular characteristics of the facility or activity. Flexibility is provided to allow applicants to propose licence conditions appropriate to their circumstances. The CNSC will review each application to ensure it meets the requirements.

The information in this document is consistent with modern national and international practices addressing issues and elements that control and enhance nuclear safety. In particular, they establish a modern, risk-informed approach to the licensing of NPPs.

5. Potential impacts

Existing licensees will have already submitted the majority of the required information with previous licence applications; in such cases, they may map the information to the safety and control area framework (described in REGDOC-1.1.3) instead of resubmitting existing information. As a result, the CNSC does not expect that significant additional information will be required from applicants, nor that significant additional cost will be incurred by the applicants. It is important to note that a graded approach may be applied.

The content of REGDOC-1.1.3 is based partly on CSA standards that were developed by national multi-stakeholder interests and expertise (including industry) and, generally, have already been implemented. The content is also based on CNSC regulatory documents that are currently in use.

For existing facilities, applicants are expected to address both this document and REGDOC-2.3.3, *Periodic Safety Reviews*.

This document is not intended for applications for a licence amendment or revocation of an operating licence.

6. Implementation

REGDOC-1.1.3 will become effective upon publication (following public consultation).

A transition period before the document becomes effective is not warranted, on the basis that:

- All existing licensees are already meeting the requirements that are included, in whole or in part, in their current licensing basis. When an existing licence becomes due for renewal, the licensee will be expected to address this regulatory document to the fullest extent possible.
- All applicants for an operating licence for a proposed new NPP will be expected to fully address REGDOC-1.1.3.

7. Feedback requested

Please submit comments or feedback to the CNSC by **[date to be determined]**, in one of the following ways:

- Email: cnscconsultation@ccsn.ca
- Mail: Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, ON K1P 5S9
- Fax: 613-995-5086