

Request for Information on the Proposed Implementation of REGDOC-3.1.2., *Reporting Requirements for Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills*

1. Preface

This document provides additional context on the proposed regulatory document REGDOC-3.1.2, *Reporting Requirements for Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills*. 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* (NSCA) 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

REGDOC-3.1.2., *Reporting Requirements for Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills* is part of the CNSC's reporting requirements series of regulatory documents, which also covers reporting requirements for nuclear power plants and other nuclear facilities.

Licensees of Class I nuclear facilities (excluding power reactors) and of uranium mines and mills are required to report to the CNSC regarding situations, events and dangerous occurrences that may require short-term action by the CNSC. Licensees must also submit an annual compliance monitoring report.

Licensees are also required to provide notification of certain normal business activities (such as work disruptions or financial status) and to file specific records with the CNSC in accordance with the NSCA and the regulations made under the NSCA.

3. Objectives

REGDOC-3.1.2 sets out requirements and guidance for reports and notifications that licensees must submit to the CNSC. This document presents the types of reports, the frequency and the applicable timeframe for reporting.

For the most part, this regulatory document brings together existing requirements for types of reports and notifications, and for the timing of each report and notification, which are spread

throughout the NSCA and the regulations made under the NSCA. A small number of additional reporting requirements (referred to as “specific reporting provisions”) are specified in the regulatory document; if the regulatory document is included in a licence, these specific reporting provisions become part of the licensing basis. As an example of a specific reporting provision, licensees will be required to report on any failure to monitor or control the release of a hazardous substance.

This regulatory document serves to standardize the reporting requirements within the licensing basis. It consolidates all reporting requirements into one reference document, for clarity and easy reference. The document will provide applicants and licensees with a single point of reference to find all reporting requirements, and will provide guidance on the expected contents of an annual compliance report.

4. Regulatory approach

REGDOC-3.1.2 incorporates and clarifies requirements for reporting found in the NSCA and the regulations made under the NSCA. It codifies and gives guidance on existing requirements, as well as specific reporting provisions for licensees who have those provisions included in their licensing basis.

For the most part, licensees already meet these requirements. REGDOC-3.1.2 is intended for inclusion in licences and will become part of the licensing basis.

Applicants are expected to describe how they will meet the requirements of REGDOC-3.1.2 when they submit a licence application and supporting documents. REGDOC-3.1.2 will be used to assess new licence applications for Class I nuclear facilities (excluding power reactors) and uranium mines and mills.

Guidance contained in REGDOC-3.1.2 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 specific problems or data 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 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.

The requirements and guidance in this document are 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 reporting requirements.

5. Potential impacts

CNSC staff anticipate little regulatory impact on applicants or licensees. Licensees are already required to submit most of the reports described in this regulatory document, within the timeframes specified in the NSCA and the regulations made under the NSCA. As described above, a few specific reporting provisions will be applied to some licensees. In addition, when REGDOC-3.1.2 is added to a licence, the timeframe for some reporting (as specified in REGDOC-3.1.2) will be increased from 21 days to 60 days.

This regulatory document clarifies that flexibility is allowed for integrated/harmonized reporting. For example, if a licensee is required to submit reports to regulatory bodies other than the CNSC, then sending a copy of the report to the CNSC is acceptable provided the copied report contains all reporting information required by the CNSC. This option allows the licensee to avoid duplication of effort and to minimize administrative burden.

6. Implementation

REGDOC-3.1.2 will become effective upon publication (following public consultation). Each licensee will have a transition period from the date that REGDOC-3.1.2 is published until it is added to their licence.

Most existing licensees already meet most of the reporting requirements described in REGDOC-3.1.2. 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 a licence for a proposed new facility will be expected to fully address this regulatory document.

7. Feedback requested

Please submit comments or feedback to the CNSC by XXdateXX, in one of the following ways:

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