

OPG Comments on Annex A to REGDOC-2.2.2, Human Performance Management Personnel Training

#	Document/ Excerpt of Section	Industry Issue	Suggested Change (if applicable)	Major Comment / Request For Clarification	Impact on Industry if Major Comment
1.	REGDOC 2.2.2	REGDOC 2.2.2 will have to be revised to reference the new Annex. Industry needs to review the revised REGDOC to be able to comment completely on the proposed Annex.	CNSC to publish for comment the revised draft of REGDOC 2.2.2 that includes the draft Annex.	MAJOR	The full impact is unknown without seeing how the Annex will be referenced.
2.	Annex A	Does this example ONLY apply to Nuclear Substances and Radiation Devices, and with Class II Nuclear Facilities and Prescribed Equipment? Annex seems to include details that could easily be applied to all training programs.	Include clear direction as to application of Annex in the REGDOC-2.2.2 body as to which types of licences it applies to.	MAJOR	This Annex should only apply to those types of licenses.
3.	Page 2 table	Tables are excellent, but there is no mention of Enabling Learning Objectives under Step 2 – Design Phase or Step 3 – Development phase.	Include both Terminal Learning Objectives and Enabling Learning Objectives in table to be consistent with the text in the REGDOC.	Clarification	
4.	Annex A page 3	Training Methods mentions “exams”. In the industry, examinations are normally associated with positions requiring certification by the CNSC.	Suggest revising “exams” to “assessments” to be consistent with the text in the REGDOC.	Clarification	
5.	Annex A page 3	Use of DIF numbers should be further explained. Does 5 mean important/frequent or not important/infrequent? In Training Description column it states “(task is highly important to safety and performed infrequently thus continuing training is needed)”. Based on this text could the DIF be 351 or 315? Please confirm that this is an example only and not a requirement.	Provide additional explanation on how to use the DIF rating system.	MAJOR	If it is not an example then this is a major concern as it will lead to significant changes in the training programs with no apparent added value.
6.	Annex A page 3	Standards column references Packaging and Transport of Nuclear Substances Regulations,	Remove references to other Regulations.	Clarification	

OPG Comments on Annex A to REGDOC-2.2.2, Human Performance Management Personnel Training

#	Document/ Excerpt of Section	Industry Issue	Suggested Change (if applicable)	Major Comment / Request For Clarification	Impact on Industry if Major Comment
		2015, Section ... This is too specific for the sample and may introduce confusion.			
7.	Page 3 table	Identified “Job” statement is actually a task statement, and “Task” statements are task elements (at least #1 and 2). This is misaligned with the REGDOC.	Clarify and align task vs. task elements – DIF rating should be performed on TASK rather than on multiple task elements.	MAJOR	Potential to cause significant confusion, inconsistency and rework for utilities, if unclear, or if incorrectly applied during inspections.