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Mr. B. Torrie
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REFERRED TO REFÉRÉ À	TORRIE B.



Dear Mr. Torrie:

Submission of Bruce Power Comments on CNSC
REGDOC 2.2.3 Personnel Certification: Initial Certification Examinations

The purpose of this letter is to submit Bruce Power's comments in regards to CNSC REGDOC 2.2.3 Personnel Certification: Initial Certification Examinations.

Industry understood that the development of REGDOC 2.2.3 was simply intended to capture the requirements of CNSC-EG1, Rev.0: *Requirements and Guidelines for Written and Oral Certification Examinations for Shift Personnel at Nuclear Power Plants (EG1)*, and CNSC-EG2, Rev.0: *Requirements and Guidelines for Simulator-based Certification Examinations for Shift Personnel at Nuclear Power Plants (EG2)*. This understanding is based on the CNSC position as stated in the following meeting minutes of the Certification and Training Advisory Group (CTAG):

- April 19, 2013 - *"It was explained that the initial version of this portion of REGDOC-2.2.3 will simply incorporate EG1 and EG2 ..."*
- November 20, 2013 - *"The vast majority of proposed changes in REGDOC 2.2.3 are minor in nature and do not affect current licensee practices."*

The current draft of REGDOC 2.2.3 does not reflect this position. Instead, it adds a significant number of new requirements, and increases several existing requirements. It also escalates guidance from EG-1, EG-2 into requirements for the initial certification examination processes. Collectively, these changes will result in significant cost and effort by the licensees with no demonstrable benefit to the safe operation of the nuclear power plants. There are some proposed requirements that are not practical, some that are not possible, and some that, if implemented as written, will result in the inability of licensees to certify new staff and may impact the ability to recertify current staff for critical operating positions.



We believe a number of these issues are a result of trying to combine the current requirements for written examinations with the requirements for simulator-based examinations, while at the same time attempting to blend the current initial examination and requalification testing requirements.

For example, the REGDOC requires “*the assurance that each examination is validated prior to conduct and the validation process...*”. This is currently done for requalification testing, but not for initial examinations, which are “verified”. This is a completely different process from validation.

Another example states “*the assurance of a high-quality audiovisual recording system capable of clearly recording the performance of the candidates during a certification examination...*”. While this makes sense for a simulator-based examination, this is not the current practice and does not make sense for the conduct of a written examination.

A significant theme introduced throughout the document seems to allow for the remote auditing of the examination processes, as opposed to addressing any identified deficiencies in current practices. New requirements such as, “*An examination will not be recognized by the CNSC unless it has been properly recorded*” introduces a level of intrusiveness the industry believes is well beyond the CNSC's stated approach to compliance verification and enforcement.

Bruce Power believes the document needs to be completely rewritten to:

- Ensure requirements are properly aligned with the intended outcomes and consistent with the fundamental principles of evaluation.
- Recognize that requirements must differ between written/oral examinations and simulator examinations.
- Remove the Policies and Procedures section, which is overly prescriptive as currently written. The REGDOC should define requirements such that licensees can determine how to meet them in their managed system. This section is impossible to comply with since policies, processes or procedures do not provide “assurances”. Rather, they describe the purpose, instructions, requirements, references, roles and responsibilities.
- Remove the significant escalation in requirements. For example:
 - Qualification requirements for Examiners and Lead Examiners that are overly restrictive. These requirements are better defined and more clearly articulated within the current requirements of EG1 and EG2.
 - The intensified pass criteria and the simultaneously increase in the complexity and difficulty of required evaluations. These changes, as outlined in the draft REGDOC appear without any identified operational issues with the current process and will significantly impact a licensee's ability to certify key staff.



- Examination follow-up requirements for the remediation of candidates who have actually passed an examination. This adds significant time and effort to an already stringent certification process.
- The requirement for 80% of the questions on the written/oral examinations to be newly designed and not based upon previous questions and the requirement to never reuse simulator-based examination scenarios. Once again, these add significant effort to exam preparation with no demonstrated benefit. Restricting the use of a question bank will instead essentially eliminate the use of multiple choice questions currently used at Bruce Power and quickly drive examination design to the fringe of minutiae. This will, in turn, undermine the SAT basis of the training programs and the linkage back to performance of safety-related tasks.
- The requirement that an examination will not be recognized by the CNSC unless it has been properly recorded. The failure of audio visual recording systems during an exam would invalidate the exam resulting in a significant cost to the utilities and burden to the candidates with no demonstrable increase in public safety.

The draft REGDOC would add significant additional costs to the licensees in terms of training staff and time to train certification candidates. Bruce Power estimates these costs at approximately \$1.5M per year for the initial certification training programs and an additional \$600K per candidate.

Bruce Power could list many additional examples of new or escalated requirements, but feel this may lead the CNSC to take a piecemeal approach to the drafting of the document, rather than using a holistic approach, as has been suggested by the CNSC for other regulatory issues. While we support the concept of updating EG1 and EG2 to align them with the CNSC REGDOC standard, we object to the significant additional requirements being placed on licensees in this current draft without any consideration of benefit or cost. In addition, our review of this draft document identified some new requirements that simply cannot be implemented, as they are in direct conflict with existing or other newly-drafted requirements.

We believe the current Canadian process for certifying highly-competent operating staff is already one of the most stringent in the world and has produced very capable graduates as evidenced by Bruce Power's operational performance and reflected in the CNSC Staff Annual NPP Reports. Compliance to the document as currently written would prevent licensees from certifying additional staff and may impact the recertification of current staff with a resulting negative impact on nuclear and public safety. This is unacceptable to Bruce Power.



We strongly urge the CNSC to consult with its stakeholders prior to considering the introduction of such significant changes in the current initial certification examination methodology. Bruce Power believes a workshop should be convened to gather and address stakeholder issues with this current draft of REGDOC 2.2.3 and welcomes the opportunity to provide the CNSC with the remainder of our comments in such a forum.

If you require further information or have any questions regarding this submission, please contact Maury Burton, Manager, Nuclear Regulatory Affairs, at 519-361-5291.

Yours truly,

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Bruce Power

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