

P.O. Box 1285  
22 Dallaire Crescent  
Richmond, Ontario  
K0A 2Z0

[chuck.mcdermott@icloud.com](mailto:chuck.mcdermott@icloud.com)

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Mr. Brian Torrie  
Director General, Regulatory Policy Directorate  
Canadian Nuclear Safety Commission  
P.O. Box 1046  
280 Slater Street  
Ottawa, Ontario  
K1P 5S9

Dear Mr. Torrie:

**Subject: Feedback on comments received for draft regulatory document REGDOC-2.2.3, Initial Certification Examinations**

Once again, NPP licensees are responding to a proposal to update regulatory requirements with hysteria and hyperbole. (I am reminded of initial licensee comments on REGDOC 2.2.2 and REGDOC 3.1.1) Although Bruce Power, NB Power and Ontario Power Generation may have some valid arguments, these are difficult to find when mixed in with over the top, inaccurate and unsubstantiated statements.

The statement "...may impact the ability to recertify current staff for critical operating positions." is one example of such an inaccurate and unsubstantiated statement. The current document does not deal with currently certified staff in any respect and to make any comment otherwise is wrong.

Mr. Saunder's assertion that the proposed requirements would add significant costs (\$1.5M per year for the initial certification training programs and an additional \$600K per candidate) is pure speculation and not substantiated in any way.

The requirement that no more than 20% of written examination questions can be based on questions from the previous two examinations is currently in force in EG-1. However, this does not stop Mr Saunders from making the unsubstantiated, and incorrect, comment that this will "quickly drive examination design to the fringe of minutiae" and "undermine the SAT (Systematic Approach to Training) basis of the training programs". This is complete nonsense with absolutely no basis in fact.

I find the statement opposing validation to be particularly worrisome for organizations that are constantly telling Commission members and the public how much they value safety and quality. The Oxford English Dictionary definition of validate is "To examine for incorrectness or bias, to confirm or check the correctness." To me, this is something a NPP licensee should be doing with every test that it designs and conducts, not just certification examinations. The argument presented, that they verify the initial certification examinations, reminds me of the current "Left Twix, Right Twix" commercials. In the end, what is expected is that the examinations are reviewed for incorrectness or bias.

Regarding remediation of candidates, Mr Saunder's statement that that "this adds significant time and effort to an already stringent certification process" is both wrong and worrisome. The Oxford English Dictionary defines remediation as "the act of correcting something that is wrong". Certification examinations are directly based on the knowledge, skills and attributes needed by certified staff; if a candidate gets something wrong on a certification examination, it means that that particular knowledge, skill or attribute has not been demonstrated. I think it is completely reasonable that this be corrected before the person is given the serious and important task of operating, or supervising the operation of, a nuclear reactor. Clearly, the more the person gets wrong, the more remediation would be necessary. If the licensees design their certification training programs using a SAT basis, the likelihood of candidates getting many things wrong should be very low.

I agree with the statement "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". However, the process of certifying key operating positions in NPPs is in place for two reasons. The first is to keep the NPPs from getting into unsafe situations in the first place. One can use past operating performance in this case as an indicator as to whether certified staff are competent. The second reason for certifying staff is for what they will be called upon to do when things don't go right and for this, past operational performance provides little indication as to the competence of operating staff. It is the certification process itself that gives the Canadian Nuclear Safety Commission, and the public it serves, the confidence that key operating staff at NPPs are competent and capable of successfully dealing with an improbable, unlikely event.

No regulatory document can be complete without the input of those that must implement its requirements and I know that this is certainly the case for REGDOC 2.2.3. However, the comments from licensees with respect to REGDOC 2.2.3 are not helpful and the Commission would be well advised to ignore the whining, call the licensees on their wildly inaccurate statements and invite them to make constructive and specific improvements to the document.

Yours truly,

C.A. (Chuck) McDermott, P.Eng.

cc: C. Francoise  
K. Ferreira