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March 9, 2015

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

**Subject: Submission of NB Power on CNSC REGDOC 2.2.3 Personnel Certification:
Initial Certification Examinations**

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

It was the understanding of industry that the development of REGDOC 2.2.3 was 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)*. The current draft of REGDOC 2.2.3 adds a significant number of new requirements plus escalation of guidance from EG-1, EG-2 to requirements plus the escalation of several existing requirements.

There are some requirements that are not practical and would result in the inability of licensees to certify new staff. We believe that a number of these issues are a result of trying to combine the requirements of the written examinations with the requirements of the simulator examinations. For example, REGDOC 2.2.3 includes a requirement that "the assurance that each examination is validated prior to conduct and the validation process..." and "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 exam, it makes no sense for a written exam.

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A significant theme throughout the document is to allow for remote monitoring of the examination process as opposed to addressing any identified deficiencies in current practices.

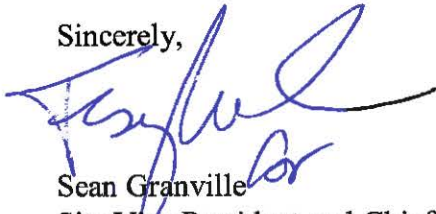
NB Power believes the document needs to be completely rewritten to:

- Ensure that the requirements are properly aligned with the intended outcome and consistent with the fundamental principles of evaluation, given that requirements differ between written, oral and simulator examinations.
- Remove the Policies and Procedures section. This is a very prescriptive section, REGDOC 2.2.3 should define the requirements; the licensee will then implement them into their processes. This section is overly prescriptive as currently written. REGDOC 2.2.3 should define requirements and the licensee will determine how to meet the requirements in their managed system. This section is impossible to comply with as a policy, process or procedure does not provide “assurances”; 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 and should revert to the current requirements of EG1 and EG2. As written NB Power would have no examiners qualified to conduct Shift Supervisor Simulator certification examinations.
 - The current draft of REGDOC 2.2.3 increases pass criteria while simultaneously increasing the required complexity and difficulty of the required evaluations in the absence of any identified operational issues with the current process; this will have significant impacts on licensee’s abilities to certify key staff.
 - There is a significant increase in examination follow-up requirements for the remediation of candidates that pass the exam; this adds significant time and effort to an already stringent certification process.
 - The requirement for 80% new and unique test items for all written oral and simulator examinations will eventually drive examination design to the fringe of minutiae thus undermining the SAT basis of the training program and the linkage back to safety related tasks.
 - Restrictions on the use of a question bank adds significant effort to exam preparation with no added benefit (i.e. at least 80% of the questions on the certification examination shall be newly designed and not based upon questions previously used in any examination, test, candidate evaluation or training).
 - 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 increase in safety.

- REGDOC 2.2.3 would add significant addition cost to the licensees in terms of training staff and time to train certification candidates.
- NB Power could list many additional examples of new or escalated requirements. While we support the concept of updating EG1 and EG2, to bring them in line with CNSC REGDOC 2.2.3 standard, we object to the significant additional requirements that are being placed on licensees in this current draft. Our review of this draft document identified some new requirements that simply cannot be implemented. We believe that the current process for certifying highly competent and capable operating staff is already one of the most stringent in the world and has produced very competent certified staff. Compliance to the document as currently written would challenge licensees from certifying additional staff with a resulting negative impact on nuclear safety. This is unacceptable to NB Power. The CNSC needs to undertake pre-consultations with the stakeholders prior to introducing significant changes in examination methodology. Industry believes that a workshop should be convened to address licensee issues with this current draft of REGDOC 2.2.3.

If you require additional information, please contact **Gerald Fairweather** at 506-659-7610 or **gfairweather@nbpower.com**.

Sincerely,



Sean Granville
Site Vice President and Chief Nuclear Officer

SG/GF/pac

cc. Mr. Colin Moses, Mr. Ken Lafrenière (CNSC - Ottawa)
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