



Point Lepreau Generating Station
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ESJ 2S6

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February 16, 2015

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

1.01.02

FILE DOSSIER	1-8-8-0
REFERRED TO REFERÉ À	Torrie, B.



Dear Mr. Torrie:

Subject: NB Power Comments on REGDOC-3.2.2, Aboriginal Engagement

The purpose of this letter is to provide NB Power's comments on REGDOC-3.2.2, Aboriginal Engagement (Reference 1). NBPN has collaborated with Bruce Power, Ontario Power Generation and Canadian Nuclear Laboratories to review the proposed regulatory document in detail. As part of the draft CNSC REGDOC 3.2.2 Aboriginal Engagement review, NB Power submits the following comments and concerns.

Stakeholder outreach is an important part of NB Power's overall presence in the communities where we operate and greatly serves in achieving our mission to proudly serve our customers. As such, NB Power has concerns with draft REGDOC 3.2.2 as currently written as it duplicates existing functions of our ongoing business activities and introduces confusion regarding Duty to Consult triggered by potential adverse impacts on aboriginal and treaty rights versus engagement activities as part of good business and community relations. It is the view of NB Power that activities associated with licensing fall into the engagement realm provided there are no new impacts and as such, there is no Duty triggered.

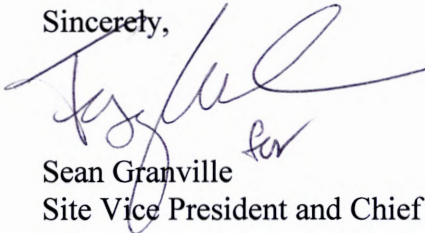
NB Power recognizes that aboriginal groups hold unique constitutional rights and NB Power makes every effort to keep them informed and appropriately engaged (i.e. licensing, operations, maintenance). NB Power strives to establish and maintain positive and productive relationships. NB Power does believe that the document needs to contain guidance for Aboriginal groups on how they can participate in the CNSC regulatory process. Currently the document provides no guidance for Aboriginal groups to help them in their engagement with the CNSC and licensees.

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On the subject of CNSC and Licensee roles, the draft REGDOC 3.2.2 needs to clarify expectations placed on the Licensee, specifically in the sharing engagement activities and dialogue. Aboriginals are important group and the CNSC and Licensees must ensure that next steps in this initiative truly enhance, and improve ongoing Aboriginal engagements and meet the needs of Aboriginal groups involved. As such, we further submit, that only relevant required documentation supporting communication and engagement be submitted as some dialogue may be sensitive.

NB Power appreciates the opportunity to provide comments on this regulatory document and is prepared to clarify our comments and concerns. If you require additional information, please contact Rick Gauthier, Regulatory Affairs Supervisor at (506) 659-6236, or rgauthier@nbpower.com

Sincerely,



Sean Granville
Site Vice President and Chief Nuclear Officer

SG/RG/aa

cc. Ben Poulet, Pierre Bélanger, Lisa Love-Tedjoutomo, Bruno Romanelli (CNSC - Ottawa)
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CNSC Site Office
Andrea Allen, Kathleen Duguay, Nicole Poirier, Jason Nouwens, Wanda Harrison, Gordon Murphy, Al MacDonald (NBP)

Reference:

1. Canadian Nuclear Safety Commission, CNSC Invites Comments on Draft *Aboriginal Engagement* - REGDOC-3.2.2, October 15, 2014.