

## **Request for Information on the Proposed Implementation of Annex A of REGDOC-2.2.2, *Personnel Training***

### **1. Preface**

This document provides additional context on the proposed Annex A of REGDOC-2.2.2, *Personnel Training*. Information provided is the result of a preliminary analysis. The Canadian Nuclear Safety Commission (CNSC) welcomes comments on this document as well as on the proposed regulatory document itself.

Comments could include additional information on the regulatory document's implementation, potential impacts or potential alternative approaches that meet the document's safety objectives. Should stakeholders decide to submit impact estimates, the CNSC encourages them to clearly state assumptions and provide enough detail to allow an independent observer to understand how the estimate was derived.

The CNSC will consider comments received. In fulfilling its mandate as a federal regulator, the CNSC must also consider values and principles that are difficult to quantify with a dollar value. It must also give consideration to fulfilling its responsibility under the *Nuclear Safety and Control Act* to disseminate objective scientific and regulatory information. In all cases, safety is the CNSC's top priority.

All comments received will become part of the public record.

### **2. Background**

Human performance is a key contributor to the safety and security of nuclear facilities, so the CNSC requires licensees to implement and maintain human performance programs. These programs address a broad range of factors that affect human performance, with the aim of minimizing the potential for errors that could affect nuclear safety and security. One of these factors is the training of workers in the nuclear industry.

In August 2014, REGDOC-2.2.2, *Personnel Training*, was published. This document sets out requirements and guidance for the analysis, design, development, implementation, evaluation, documentation and management of training for nuclear licensees within Canada, including the essential principles and elements of an effective training system. Since REGDOC-2.2.2's publication, licensees have asked for further guidance on using a systematic approach to training (SAT), particularly for the development of radiation safety training programs.

Annex A has been created to provide more guidance on how to apply SAT-based processes and procedures to the development of radiation safety training programs for workers involved in licensed activities with nuclear substances and radiation devices, and with Class II nuclear facilities and prescribed equipment.

The annex consolidates some information from G-313, *Radiation Safety Training Programs for Workers Involved in Licensed Activities with Nuclear Substances and Radiation Devices, and with Class II Nuclear Facilities and Prescribed Equipment*, which assisted licensees and applicants with developing radiation safety training programs.

### **3. Objectives**

The objectives of this amendment to the regulatory document are to:

- clarify the steps for developing a training system, to assist in the creation of simplified training programs that meet the requirements of REGDOC-2.2.2
- provide additional guidance through practical examples for developing and implementing systematic training programs
- assist licensees with limited experience using a SAT, by providing additional guidance to demonstrate how SAT-based processes and procedures could be applied in developing radiation safety training programs

### **4. Regulatory approach**

REGDOC-2.2.2 requires radiation safety training programs that are developed and implemented by licensees to be performance-oriented and systematically developed. Annex A does not present any new requirements for licensees, but provides examples to outline a methodology that may be used to meet REGDOC-2.2.2's requirements.

G-313 provides guidance on the implementation of SAT-based training, and the design and development of SAT-based radiation safety training programs. Following the consultation period, REGDOC-2.2.2 will be republished with Annex A, to consolidate the guidance from G-313 into a single document.

The annex will assist both licensees and the CNSC in the application for and verification of licences.

### **5. Potential impacts**

There is no expected increase to cost or burden for licensees, as the annex provides guidance only.

Some licensees may benefit from the additional guidance, thus reducing the time needed to develop radiation safety training programs.

### **6. Implementation**

REGDOC-2.2.2 was published in August 2014. As Annex A does not introduce any new requirements, the document will remain in effect upon its republication, and the implementation period will be unchanged from the initial publication. Publication of the annex will not affect transition periods given to individual licensees for compliance with REGDOC-2.2.2's requirements. Associated licence conditions handbooks will be amended as soon as practicable following publication, to reference the latest version of REGDOC-2.2.2, *Personnel Training*.

## 7. **Feedback requested**

Comments or feedback may be submitted to the CNSC no later than May 12, 2016, in one of the following ways:

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