



**Written submission from  
Ontario Power Generation Inc. -  
Pickering**

**Mémoire de  
Ontario Power Generation Inc. -  
Pickering**

In the Matter of

À l'égard de

**Request for a temporary exemption from  
subsection 9(4) of the Class I Nuclear  
Facilities Regulations**

---

**Demande d'exemption temporaire du  
paragraphe 9 (4) du Règlement sur les  
installations nucléaires de catégories I**

---

Public Hearing - Hearing in writing based on  
written submissions

Audience Publique - Audience fondée sur des  
mémoires

**June 2020**

**Juin 2020**

April 29, 2020

  
Redacted

CD# P-CORR-00531-06009

**Mr. M. A. LEBLANC**  
Commission Secretary

Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, Ontario  
K1P 5S9

Dear Mr. Leblanc:

## **Pickering NGS: Request for Exemption from Class I Nuclear Facilities Regulations**

---

The purpose of this letter is to request, pursuant to Section 7 of the *Nuclear Safety Control Act* and Section 11 of the *General Nuclear Safety Control Regulations*, that the Commission grant an exemption from Section 9(4) of the *Class I Nuclear Facilities Regulations*. If the Commission grants this exemption, OPG subsequently requests the 6-month extension of personnel certifications that will expire in 2020 at the Pickering NGS.

Section 9(4) of the *Class I Nuclear Facilities Regulations* states that certifications issued by the Commission expire five years after the date of issuance or renewal.

Due to the COVID-19 pandemic and the compensatory actions that OPG has undertaken to secure the reliable and safe operation of its facilities, we have postponed the conduct of the Requalification Testing program for up to six months, thus putting personnel certifications in jeopardy of expiring.

OPG requests that the Commission grant an exemption to Section 9(4) of the *Class I Nuclear Facilities Regulations*, and grant a 6-month extension to the current certification expiry dates for the four (4) Pickering NGS staff identified in Attachment 1. This will help ensure a sufficient number of certified staff for minimum complement requirements and allow OPG to maximize nuclear safety during this time of crisis.

Each of the staff identified in Attachment 1:

- (a) has safely and competently performed the duties of the position for which they are certified at the Pickering NGS;
- (b) continues to receive the applicable training referred to in the Pickering Nuclear Power Reactor Operating Licence, PROL 48.01/2028;
- (c) has successfully completed at least one of the two types of requalification tests referred to in PROL 48.00/2028, for renewing a certification; and
- (d) is capable, in my opinion, of performing the duties of position for which they are certified at Pickering NGS.

A complete record of each person's performance in the continuing training and the re-qualification testing program is available upon request.

OPG will conduct each outstanding requalification test during the amended period of certification, and will submit renewal applications for the staff identified in Attachment 1, once such tests are successfully completed.

We request that, if the Commission grants this exemption, that the CNSC issue the 6-month extensions to the current certifications as soon as possible.

If you have any questions regarding this submission, please contact Richard Geofroy, Director of Operations and Maintenance at 905-839-1151, extension 5794.



Mark R. Knutson, P. Eng.  
Senior Vice President  
Pickering Nuclear

cc: A. Viktorov, Director, Pickering regulatory Program Division, Ottawa  
L. Désaulniers, Acting Director Personnel Certification Division, Ottawa

Attachments:

1. "Pickering Certified Staff".