



**Written submission from  
Louis-Arthur Langlois**

**Mémoire de  
Louis-Arthur Langlois**

In the Matter of

À l'égard de

**Application for a temporary exemption  
from sections 23.1.2(2) and 23.2.1 of  
REGDOC-2.2.3, Personnel Certification,  
Volume III: Certification of Persons  
Working at Nuclear Power Plants**

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**Demande visant l'exemption temporaire de  
l'application des sections 23.1.2(2) et 23.2.1 du  
document REGDOC-2.2.3, Accréditation du  
personnel, tome III : Accréditation des  
personnes qui travaillent dans des centrales  
nucléaires**

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Public Hearing - Hearing in writing based on  
written submissions

Audience Publique - Audience fondée sur des  
mémoires

**July 2021**

**Juillet 2021**

Canadian Nuclear Safety Commission  
280 Slater St., Ottawa, OH K1P 5S9

**Attention: Ms. Velshi, CNSC President**

Reference: **2021-H-103**: Bruce Power License Amendment – Certified Staff

**Subject: Certified Staff Training Amendment – Reduced Training Period (12 to 6 Months)**

Dear Independent Commissioners:

**Critical Reasoning on the Proposed Amendment**

The Amendment as filed includes little or no Systematic Approach to Training (SAT) documentation to support the application based on our assessment. If you are performing Oversight, you might want to think how you can increase a learning rate from 2000 to 4000 hour per year. A SAT analysis is required and must be prepared by two Subject Matter Expert, one for each NPP, to ensure safety per SAT Procedures and NSCA required by license and NSCA, **more specifically 49(1)**. Some uncompressible activities such as Simulator Training time and Simulator Testing time must be floodlit.

**CNSC Staff Oversight and the Nuclear Safety and Control Act 49(1)**

Planning the ANO Personnel requirements is well documented and should be articulated for Commissioners. Nuclear Safety and Control Act 49 (1) requires that <all time> the Control Room be staffed by ANO. Previous NPP Licensee have **failed to comply**, refer to IRS 8096, and CNSC Staff have failed to acknowledge the supporting evidence of neglect. CNSC Presidency Amendment ensued right after a Reportable Event that occurred on October 27, 2009, at 12:11..

**Bruce Power Oversight**

Bruce Power Management Control Room Staff concern themselves. Please note that Bruce Power Staff filing the proposed amendment are aware or should be aware to operate safely of the content of this letter.

Anyone agonistical could have seen this situation pending. Founded on CNSC Staff aforementioned decision following the IRS 806 Reportable Events (RE), Commissioners will do the same as your CNSC President ancestor did following the RE without entirely informing the most concerned CNSC Staff. And CNSC Staff following up on all the IAEA Staff requirements stated in IRS 8096.

**CNSC Presidency Oversight**

A CNSC President Oversight example is when a **Panel of One** was created by the CNSC President to amend Gentilly II License in regards to Authorized Nuclear Operator <re-certification>. CNSC President and unmentioned CNSC Staff Member(s), immediately after a Nuclear Power Plant Reportable Event that occurred on October 27, 2009, at 12:11, circumvented the usual safe process for Authorizing Nuclear Power Plant personnel. And the present proposed Amendment is a similar unplanned action however not after a Reportable Event. However, 49(1) requires that at <all time> sufficient Control Room Staff must be present. If Bruce Power representatives anticipates that such requirement cannot be met, a statement in regards to how the sufficiency is at jeopardy.

Please note that that the IAEA Staff documented in IRS 8096 one of the causes of the Reportable Event as insufficient staffing. Matching evidence, an IRS Panel of Expert assembled by the IAEA shed light and a pertinent critical reasoning on an obscure CNSC Oversight dysfunction. Please note that the Panel of Expert document informed some **CNSC Staff four years after the Reportable Event** that the Gentilly II had really occurred. CNSC Staff raised concerns via an email immediately on March 20, 2014, four years after the Reportable Event.

**Reprisal**

We request a CNSC Hearing to offer a forum where for example: Mr. Gilles Turcotte, CNSC Staff and Certification Officer Leave, **Mr. Declan Whelan's** accusations, CNSC Staff, and all concerned Citizens can explain how Authorized Nuclear Operators are deemed to be certified in a transparent way. And March 20, 2014, Email circumstance and consequences can must brought to light by all concerned Canadians Citizens for their safety.

Furthermore, during Hearing, CNSC Staff can be questioned about the denial of insufficient Control Room staffing <at all time> to the IAEA Staff without supporting numbers, evidence, and license information. And how CNSC Staff did not conduct a Trend Analysis on ANO Errors and circulated it among CNSC Staff and CANDU Owners.

#### **CNSC Presidency Oversight Continued**

Information directly related to the present application should be forwarded to Independent Commissioners. The information was delivered to Ms. Velshi.

On June 15, 2020, IRS 8096 and an IRS Panel of Expert report issues, such as <Withholding Evidence> were raised to the Presidency, Ms. Velshi. Mr. Kevin Sawyer, Lawyer had had hand delivered to CNSC Staff a comprehensive document making documented allegations, **including Licensing Amendments for certification of staff**. We filed in writing to the CNSC Commission because Mr. Marc Leblanc, CNSC Secretary **denied** our Right to Be Heard in a Public Hearing. An Investigation was launched by CNSC President because the documents were lost for several months.

#### **Consequence to a Nuclear Power Plant**

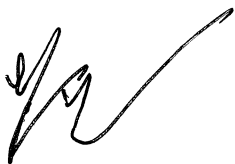
Please note, based on our understanding of the information obtained about on the October 27, 2009, at 12:11 Reportable Event, we believe that the Reportable Event was a significant factor into continuing operations of Gentilly II Nuclear Power Station Operation, please refer to the last exchange between Mr. Francois Rinfret, CNSC Staff and CNSC President in CNSC Hearing Proceedings.

#### **CNSC OVERSIGHT FUNCTION and BLACKOUTS (Class IV): Pickering Nuclear Generating Stations Complex and Gentilly II**

**In regards to the October 27, 2009, at 12:11, based on the information obtained and our understanding of the Gentilly II Reportable Event, the Blackout (Class IV) that occurred is not stated as an issue in any document in all Nuclear Safety documents reviewed. And the Oversight Function did not bring the Blackout out into the open at any time.**

**In regards to the last North (East) American Black, based on the information obtained and our understanding of the Interstation Transfer Bus b(ISTB), linking PNGS-B and PNGS-A and providing Emergency Power, failure to operate, PNGS-A suffered a Blackout (Class IV). And the issue is not raised publicly. And the Oversight Function did not bring it out into the open. The Blackout Report was reclassified around the same period a new CNSC Staff Member requested the obtain the document.**

Please make request in writing if you require or need guidance to attain the supporting evidences and its meaning in reference to the contents of this letter. All evidence stated in this letter are CNSC Court of Records. And they are willingly accessible. However, their accessibility has been to CNSC Staff Members denied or delayed.



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CC:

- 1) NRCan Ministry
- 2) Privy Council
- 3) Nuclear Regulatory Commission