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SUPPLEMENTAL/COMPLÉMENTAIRE

CMD: 21-H103.B

Date signed/Signé le : 17 JUNE 2021

Reference CMD(s)/CMD(s) de référence : 21-H103, 21-H103Q, 21-H103.1,  
21-H103.A

**Request for a temporary exemption from the requirement under paragraph 9(2)(b) of the *Class I Nuclear Facilities Regulations* for reactor operators certified at Ontario Power Generation hired into the initial certification program at Bruce Power**

**Demande d'exemption temporaire de l'exigence de l'alinéa 9(2)(b) du Règlement sur les installations nucléaires de catégorie I pour les opérateurs de réacteur accrédités à Ontario Power Generation qui sont embauchés dans le programme d'accréditation initiale de Bruce Power**

Hearing in writing based solely on written submissions

Audience fondée uniquement sur des mémoires

Scheduled for:  
July 2021

Prévue pour :  
juillet 2021

Submitted by:  
CNSC Staff

Soumise par :  
Le personnel de la CCSN

e-Doc 6578548 (WORD)  
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**Summary**

This supplemental Commission Member Document (CMD) provides CNSC staff's response to questions raised by the Commission panel members in CMD 21-H103Q.

**Résumé**

Ce CMD supplémentaire apporte les réponses du personnel de la CCSN aux questions posées par les membres de la formation de la Commission dans le CMD 21-H103Q.

**Signed/signé le**

17 June 2021/ 17 juin 2021

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**Director General**

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## EXECUTIVE SUMMARY

In conducting the hearing in writing respecting [CMD 21-H103](#), the panel of the Commission requested additional information about the submissions from Bruce Power and CNSC staff. This hearing in writing considers whether to temporarily exempt Bruce Power from the requirement pursuant to paragraph 9(2)(b) of the [Class I Nuclear Facilities Regulations](#) for reactor operators certified at Ontario Power Generation and hired into Bruce Power's initial certification program.. CMD 21-H103Q provides seven questions, with six of the seven questions requesting a response from CNSC staff. This supplemental submission provides CNSC staff's responses to these questions.



## 1 OVERVIEW

This supplemental CMD addresses a request for additional information from a panel of the Commission conducting the hearing in writing [CMD 21-H103](#). This hearing considers whether to temporarily exempt Bruce Power from the requirement pursuant to paragraph 9(2)(b) of the [Class I Nuclear Facilities Regulations](#) for reactor operators certified at Ontario Power Generation and hired into Bruce Power's initial certification program. In conducting the hearing in writing, the panel requested responses to seven questions from Bruce Power and CNSC staff via CMD 21-H103Q. Six of the seven questions were directed to CNSC staff in respect of CMD 21-H103.

## 2 CNSC STAFF'S RESPONSES TO THE PANEL OF THE COMMISSION'S QUESTIONS IN CMD 21-H103Q

Via CMD 21-H103Q, the panel of the Commission requested both Bruce Power (Table 1) and CNSC staff (Table 2) to respond to several questions.

CNSC staff's responses to the panel's six questions are in the table below. For ease of understanding, the panel's numbering system for the questions in Table 2 in CMD 21-H103Q was maintained. The numbering in Table 2 did not include Question 1, as it was directed to Bruce Power through Table 1 of CMD 21-H103Q. As such, it is noted as 'n/a' in the table below.

### CNSC staff responses to questions submitted by a panel of the Commission via Table 2 of CMD 21-H103Q

	Commission Panel Questions	CNSC Staff Response
1.	n/a	n/a
2.	How many candidates will benefit from the exemption?  How many years of plant experience do they have in general?	<p>CNSC staff understand, based on information available, that there could be six Bruce Power candidates ready to start the structured Learning Package should the temporary exemption be granted.</p> <p>Respecting plant experience, CNSC staff estimate that these candidates would have:</p> <ul style="list-style-type: none"> <li>• 2 to 6 years of initial plant experience;</li> <li>• 4 to 5 months of additional plant experience and 8 months of simulator-based training in a full scale replica of the control room during the initial certification program; and</li> <li>• 5 months to 3.5 years in a certified</li> </ul>

		role at Pickering.
3.	<p>Does the exemption enter into force the day it is approved by the Commission?</p> <p>Or is it retroactive?</p>	<p>Bruce Power would implement the structured Learning Package, as presented in CMDs <a href="#">21-H103</a> and <a href="#">21-H103.1</a>, after the exemption has been granted.</p> <p>There is no need for a retroactive exemption in respect of this request.</p>
4.	<p>Will the temporary exemption remain valid until the next amendment of REGDOC-2.2.3 is published in 2022?</p> <p>Will this amendment be similar to the present temporary exemption?</p>	<p>CNSC staff recommend that the temporary exemption remain in effect until the next amendment of REGDOC-2.2.3, Volume III is published, now expected in 2023.</p> <p>CNSC staff plan to address personnel transfer requirements (similar in nature to those being contemplated by this exemption) in the next amendment of REGDOC-2.2.3, Volume III.</p> <p>Additional information on the planned amendment to REGDOC-2.2.3, Volume III is found at section 2.2 of CMD 21-H103 and at section 3 of CMD 21-H103.A.</p>
5.	<p>Considering the facts that:</p> <ol style="list-style-type: none"> <li>1. the physical location of primary accessible equipment by Operations Staff differs between the Pickering CANDU 500 and the Bruce CANDU 750 Series;</li> <li>2. the plant experience of the candidates at Bruce NPP is limited;</li> <li>3. and a different nomenclature for systems identification is employed at Pickering and Bruce stations,</li> </ol> <p>could the six-month reduction in plant experience at Bruce NPP pose unreasonable risk in an emergency situation?</p>	<p>CNSC staff have determined that the 6-month reduction in Bruce NPP plant experience does not pose an unreasonable risk to safety or security or in an emergency. Further details on CNSC staff's assessment on this topic can be found at section 2 of CMD 21-H103.A.</p>
6.	<p>Are the candidates trained to handle emergency situations specific to</p>	<p>The structured Learning Package initiates training on emergency situations</p>

	Bruce NPP in the ‘structured learning package’?	<p>by imparting the necessary knowledge of locations and elevations for hazard assessment during emergency response. Candidates will be trained to handle emergency situations specific to the Bruce NPP through completion of the initial training requirements provided for by REGDOC-2.2.3 Volume III, specifically through section 23.2.3, Nuclear power plant-specific training, section 23.2.4, Simulator-based training and section 23.2.5, On-the-job training.</p> <p>CNSC staff confirm that no training component on emergency response will be left out. Additional details regarding emergency response duties can also be found at subsection 2.1 of CMD 21-H103.A.</p>
7.	Candidates are exempted from the General Certification examination. Do the candidates still have to pass other certification examinations specific to the Bruce NPP?	<p>The General Certification examination is CANDU NPP neutral and is equally valid at both the Pickering and Bruce NPPs.</p> <p>In addition to completing the structured Learning Package, candidates will have to pass two additional certification examinations that are specific to Bruce Power. These examinations include (1) a written-based station specific certification examination, followed by (2) a simulator-based certification examination.</p>

### 3 CONCLUSIONS

In this CMD, CNSC staff provided responses to questions from a panel of the Commission (CMD 21-H103Q) in respect of the hearing in writing CMD 21-H103. This hearing considers a request for a temporary exemption from requirements under paragraph 9(2)(b) of the *Class I Nuclear Facilities Regulations* for reactor operators certified at Ontario Power Generation and hired into the Bruce Power initial certification program.

CNSC staff's conclusion remains unchanged, that the Commission's granting of a temporary exemption, which will authorize Bruce Power to use the proposed alternative approach for additional plant experience in respect of the initial certification training program, is reasonable and acceptable and will not have an impact on Bruce Power's safety envelope.

## REFERENCES

1. Bruce Power Letter, M. Burton to M. Leblanc, “Alternate Approach for Minimum Experience and Generals Training requirements for Personnel Certified at Ontario Power Generation hired into the Initial Certification Program at Bruce Power”, November 30, 2020, BP-CORR-00531-00809, e-Doc 6433624.
2. Bruce Power Letter, M. Burton to M. Leblanc, “Request for a temporary exemption under section 7 of the Nuclear Safety and Control Act and section 11 of the General Nuclear Safety and Control Regulations”, March 30, 2021, BP-CORR-00531-01481, e-Doc 6527264.
3. CNSC Regulatory Document [REGDOC-2.2.3, Volume III Certification of Persons Working at Nuclear Power Plants](#), September 2019.