



**TU 06374
PICA 13-6368**

October 18, 2013

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

Dear Mr. Poulet:

Subject: NB Power comments on REGDOC 2.10.1 (Nuclear Emergency Preparedness and Response)

This purpose of this letter is to provide comments on REGDOC 2.10.1 (Reference 1). NB Power staff has reviewed the draft document, and have a number of comments on its content. Detailed comments are provided in Attachment 1. The main areas we are concerned with are:

- 1) The requirement for facilities inside the primary zone to be hardened.
- 2) A reduced time period for preparation of full scale exercise reports.
- 3) The requirement for licencees to report results of plume dispersion and dose modelling, as these are currently done by an external organization.
- 4) It may not be possible to notify the CNSC prior to containment venting.

NB Power thanks you for the opportunity to comment on the draft document and is pleased to discuss any items that require clarification. If you require additional information, please contact **Scott Robertson** at 506-659-7651 or srobertson@nbpower.com.

Sincerely,

Keith Miller
DCWO
(for Sean Granville)

Sean Granville
Site Vice President and Chief Nuclear Officer

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SG/SR/sr

- cc. Pierre Bélanger, Lisa Love-Tedjoutomo, (CNSC - Ottawa)
CNSC Site Office
Al MacDonald, Claire Harris, Derek Mullin, Paul Thompson, Kathy McRae,
Andy Hayward, Charles Hickman (NBP)

References:

1. Canadian Nuclear Safety Commission, *Nuclear Emergency Preparedness and Response*, RegDoc-2.10.1, 2013 August.

Attachments:

1. Attachment 1: NB Power comments on REGDOC 2.10.1

Attachment 1: NB Power comments on REGDOC 2.10.1

Document section/ excerpt of section	Comment	Suggested change (if applicable)	Major Comment/ request for clarification
1.3	“credible accident” should be defined as it is open for interpretation.	Add definition or reference to definition. Ensure clarity to differentiate from “worst case scenario”	Request for clarification
Figure 1	Offsite Emergency Response on Diagram	Offsite ER is currently noted only at the level of BDBA. Offsite Emergency Response occurs within a DBA Concept of “on-site” and “off-site” should be defined.	Major Comment
2.2 Guidance 3 rd para	Redundant information found in licences and LCHs.	Delete: <ul style="list-style-type: none"> submit all EP program changes to the CNSC at least 30 days before implementing “ 	Major Comment
2.3.2 (5C)	Notification of CNSC “within 15 minutes of activation of ERO and again within 15 minutes of initial notification to offsite authorities” is new and adds additional demands on operating staff at a critical time in the response to the event.	Suggest rewording as follows: b) off-site authorities are notified within time-frame defined by Provincial / Territorial authority c) All Notifications follow direction provided in RD 3.1.1	Major Comment
2.3.2 Guidance	Note that the categories listed do not match NBEMO offsite classification terminology.		
2.3.3 (7&8)	Licenses should identify in their program who will do 7 & 8. NB Power relies on Health Canada for plume dispersion and dose modelling.	Modify wording to indicate the licensees should identify in their program the organization who will perform plume dispersion and dose modelling.	Major comment
2.3.4 (5)	promptly and regularly provide recommendations to offsite authorities and the CNSC when protective action is required	Suggest rewording 5 as follows: 5. identify the organization responsible to determine protective actions. Or Remove from this RD, as this is not within the authority of the Utility. Licensee provides data only.	Major Comment

Attachment 1: NB Power comments on REGDOC 2.10.1 (cont'd)

Document section/ excerpt of section	Comment	Suggested change (if applicable)	Major Comment/ request for clarification
2.3.4 (8)	Public evacuation time estimates should be provincial offsite responsibility. We rely on NBEMO for this.	Modify wording that evacuation will be achieved "as soon as achievable" rather than trying to estimate.	Request for clarification
2.3.4 (11/12)	The requirement to notify the CNSC prior to nominal venting and the requirement to ensure consultation prior to alternate venting must have an allowance for situations where venting is required without first having these activities carried out.	Suggest reword for 11 & 12 as follows: 11.and ensure, that where practicable, notification is made ... 12.and ensure, that where practicable, consultation ...	Major Comment
2.3.5	PLGS only does accounting for personnel within the protected area, not the entire site as indicated.	Clarify what is meant by onsite, or specify within protected area.	Request for clarification
2.3.6 (6)	Emergency response facilities within the primary zone may not be hardened for existing plants (and potentially not for new plants). Existing plants have a range of backup facilities that can be utilized if required.	Add a provision that: "Hardened emergency response facilities within the primary zone may not be required, provided alternate diverse provisions are in place."	Major comment
2.3.6 (11)	We interpret "display nuclear facility data" as including hardcopy chart/paper as well as electronic displays, in event of power unavailability.	Add wording to indicate hardcopy chart/paper and electronic displays meet the intent of this statement.	Request for clarification
2.3.9 (3)	Notification should be in accordance with licensee change management process; also covered by license handbook which lists documents required to be submitted.	Reference License handbook requirements	Request for clarification
2.4.1	In some cases PLGS does not provide the offsite authority radiation protection training.	Change "provide" to support. Delete "must be submitted to the CNSC at least 30 days prior to implementation".	Request for clarification
2.4.4 (15)	Requirement for full-scale emergency exercise self-assessment reports to be submitted to the CNSC within 40 days does not allow sufficient time for a quality response.	Suggest that the requirement should be to submit the reports within 90 days.	Major comment