

June 24, 2014

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NK29-CORR-00531-11824

Mr. B. Torrie
Director, Regulatory Policy Directorate
Canadian Nuclear Safety Commission
P.O. Box 1046
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Torrie:

Bruce Power Comments on REGDOC 2.3.1, Construction of Nuclear Facilities

The purpose of this letter is to provide Bruce Power comments on REGDOC 2.3.1, Construction of Reactor Facilities.

Bruce Power is concerned with the content of the proposed Regulatory Document regarding the construction of reactor facilities. While we understand and appreciate the intent, the proposed document attempts to go well beyond regulatory requirements and includes good practices, general management principles, and how to guides for those unfamiliar with nuclear requirements. The result is a general confusion of issues and a lack of clear direction on regulatory objectives. A few examples in “shall” statements include:

- communication and relationships among all parties that are open and constructive, and identification of problems before they become serious
- control of emergent work
- processes to manage claims and disputes.

While these activities would be part of normal management systems it is hard to see how they are regulatory requirements. Open and constructive relationships are always desirable but are sometimes not fully achievable and other means may need to be used. This document contains many such examples of this and where it attempts not only to set the requirement but to define the how. The document needs to be refocused to clearly define the regulatory requirements and objectives. Good practices and the suggestion of means to carry out activities must be clearly separated.

Additionally this document attempts to combine requirements for construction activities that would be part of a new build with those for a construction activity on a currently licensed site. Sites and facilities with an existing CNSC Licence operating to standards such as CSA N286 already have these requirements defined within their approved management system. Attempting to restate or redefine these requirements in this document is unnecessary and greatly confusing. At the time of new construction full management systems such as N286 may not be in place and this guidance is necessary and appropriate for that activity.



In our view this document is not yet ready for publication or adoption into a Licence. It was not productive to comment on individual content since in our view the structure itself is questionable. We strongly recommend instead that CNSC organize a workshop(s) for all interested parties including those with extensive experience in these areas to gain the appropriate insights.

If you require further information or have any questions regarding this submission, please contact Mr. Maury Burton, Department Manager, Regulatory Affairs, at (519) 361-5291.

Yours truly,

A blue ink handwritten signature, appearing to read 'Frank Saunders', with a long horizontal flourish extending to the right.

Frank Saunders
Vice President Nuclear Oversight and Regulatory Affairs
Bruce Power

cc: CNSC Bruce Site Office (Letter only)
K. Lafrenière – CNSC Ottawa