

Belyea, Sean

From: Belyea, Sean
Sent: Thursday, October 24, 2013 9:44 AM
To: Belyea, Sean
Subject: FW: comments on REGDOC 2.3.2 Accident Management

From: Michel A. Duguay [mailto:michel.duguay@gel.ulaval.ca]
Sent: Tuesday, October 15, 2013 11:21 PM
To: Consultation
Cc: michel.duguay@hotmail.com; Interventions
Subject: comments on REGDOC 2.3.2 Accident Management

Dear CNSC consultation team for REGDOC 2.3.2,

Here are a few comments on the proposed new regulation document REGDOC 2.3.2 which has incorporated many lessons learned from Fukushima and from general progress in nuclear technology.

-1. In general I think that the new document is excellent, but is very demanding in terms of implementation in the field. One can see that many severe accident scenarios have been thoughtfully considered and analysed in detail. Implementing in practice all the demands and recommendations in REGDOC 2.3.2 will not be easy for the nuclear industry. A strictly monitored implementation of REGDOC 2.3.2 would most likely significantly reduce the negative consequences of a nuclear core-melt accident.

-2. However, in several letters to the CNSC my colleagues and I have made a case for paying focussed attention to **nuclear engineer John Waddington's** October 2009 article on nuclear safety. Waddington and many analysts have pointed out the crucial role played by the so-called "*institutional failure*" phenomenon largely responsible for major accidents in many different fields. Unless CNSC management can respond adequately to this challenge, the probability of occurrence of a severe nuclear accident will be reduced at best by a factor of two, well short of the factor of 10 reduction that John Waddington proposes as an objective.

-3. Regulatory document REGDOC 2.6.3 on "*Fitness for Service, Aging Management*" talks on page 3 about physical aging and about "*the need to derate the reactor power to maintain safety margins*". In view of Article 9 of the *Nuclear Safety and Control Act* (NSCA) of 1997, isn't it a logical application of REGDOC 2.3.2 that the CNSC should derate the power level of older reactors, such as the ones in the Pickering nuclear power plant ? This would of course improve nuclear safety and it would benefit the nuclear workers in extending their active work life, and in improving their retirement benefits.

Article 9 of the NSCA stipulates that the CNSC should seek to keep the nuclear accident probability at a socially acceptable level and to inform the public in an objective and scientific manner. At the moment the CNSC does not fully comply with Article 9 of the NSCA. If the CNSC does not fully comply with the NSCA, why should the nuclear industry be forced to comply ?

With my regards,

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