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April 17, 2013

Mr. B. Torrie  
Director, Bruce Regulatory Program  
Canadian Nuclear Safety Commission  
P.O. Box 1046, Station B  
280 Slater Street  
Ottawa, Ontario, Canada K1P 5S9

Dear Mr. Torrie:

**Historic Saugeen Metis Feedback on Comments submitted to CNSC from interested stakeholders on CNSC's proposal to amend several regulations.**

**DIS-13-02, Proposed Amendments to Regulations Made Under the Canadian *Nuclear Safety and Control Act*.**

Historic Saugeen Métis (HSM) endorses the comments of the following stakeholders to ***not support*** the proposal "2.2 *Inclusion of human performance and fitness for duty requirements in the General Nuclear Safety and Control Regulations*":

Bruce Power, Power Workers' Union, Ontario Power Generation, and others

HSM agrees that the current detailed framework of legislative and regulatory requirements and licence conditions provides significant guidance to licensees and workers in the area of human performance management and fitness for duty.

All Canadian Licensees have robust Human Performance programs. There are many important Programs ensuring safe operation at nuclear facilities. The current Act and Regulations gives CNSC authority to enact specific requirements through Licensing and Regulatory Documents. Specific regulations should only be enacted in an area if this authority is insufficient to ensure safety.

The Discussion Paper did not provide justification for this addition and therefore, any new regulation adds burden and should only be undertaken where sufficient authority does not already exist or there is a proven safety issue found that is not being addressed by current regulations.

Currently Licensees refine their human performance management programs to maintain the best practices for the safest nuclear industry possible in conjunction with workers and stakeholders in consultation processes. These processes are needed to stay as up to date as possible rather than waiting for lengthy regulatory timelines.

The current legislative and regulatory framework, including the relevant regulatory documents, provides ample guidance to licensees and workers and HSM agrees that no change is warranted.

HSM thanks the Commission for the opportunity to provide feedback on the Comments received on the Discussion Paper DIS-13-02, Proposed Amendments to Regulations Made Under the Nuclear Safety and Control Act.

Yours very truly,

A handwritten signature in cursive script that reads "Archie Indoe".

President Archie Indoe  
Historic Saugeen Metis

CC Bruce Power  
Power Workers' Union  
Ontario Power Generation