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Sent: Thursday, September 14, 2017 11:15 AM
To: Heppell-Masys, Kathleen (CNSC/CCSN); Consultation (CNSC/CCSN)
Cc: Keith Garel; TZOTZOS Katherine -C I O; MITCHELL Leslie -NUCLEAR;
MIDDAUGH Erin -NUCLEAR; ASADI Rafi -NUCLEAR; SEID Hamdi -NUCLEAR
Subject: OPG Comments on Draft REGDOC 2.4.3 Nuclear Criticality Safety
Attachments: OPG Comments on Draft REGDOC 2 4 3 Nuclear Criticality Safety.docx; OPG
Comments on Draft REGDOC 2 4 3 Nuclear Criticality Safety.pdf

OPG Proprietary

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OPG Comments on Draft REGDOC 2.4.3 Nuclear Criticality Safety

The purpose of this email is to provide Ontario Power Generation (OPG) comments on Draft REGDOC-2.4.3, Nuclear Criticality Safety, and to request further opportunity for review, once the draft has been revised.

OPG appreciates the opportunity to provide comments during the development of this regulatory document, and has reviewed this draft in conjunction with other licensees.

OPG's concerns with the proposed document as currently written can be broadly summarized as follows:

- i. The draft REGDOC contains extensive direction that was previously guidance. For example, guidance that was provided in GD-327 has been converted into requirements in the draft REGDOC and should be converted back to guidance. Having a clear distinction between requirements and guidance is important to enable licensees to avoid compliance issues with REGDOC-2.4.3 once it is published.
- ii. The draft REGDOC does not always correctly transcribe technical requirements verbatim from American Nuclear Society (ANS) Standards. If requirements are not consistent, licensees face the potential of using incorrect information which could have safety implications.
- iii. Some of the content contained within this draft REGDOC (eg in Sections 2.3.2.1 and 12) duplicates requirements documented within CSA N286-12, Management System Requirements for Nuclear Facilities. Requirements which are already contained in the licensing basis should not be duplicated in additional REGDOCs.

OPG's detailed comments are contained in the attachments to this email. For your convenience, a word version is also provided.

Because of the substantive nature of these comments, OPG requests an opportunity for further review of this REGDOC once the draft has been revised to address stakeholder comments.

If you have any questions or concerns, please contact Ms. Leslie Mitchell, Manager, Regulatory Programs, Strategy and Support at (905) 839-6746, extension 5198, or by e-mail at leslie.j.mitchell@opg.com<<mailto:leslie.j.mitchell@opg.com>>.

Sincerely,

Robin Manley
VP Nuclear Regulatory Affairs and Stakeholder Relations OPG

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