

August 7, 2013

Canadian Nuclear Safety Commission
PO Box 1046, Station B
280 Slater Street
Ottawa, ON K1P 5S9

ATTENTION: Directorate of Safety Management

**SUBJECT: Invitation to provide feedback on the comments received on
REGDOC-2.2.2**


To whom it may concern:

This letter is in response to the invitation to provide feedback on comments submitted in response to the issue of draft REGDOC-2.2.2, Personnel Training. Staff at the McMaster Nuclear Reactor (MNR) have reviewed the comments submitted by other nuclear facilities and associations. While MNR generally agrees with the comments provided by AECL, Bruce Power, New Brunswick Power, and Ontario Power Generation, MNR hopes that any process undertaken to revise and incorporate comments will equally consider licensees of all sizes and scopes.

Historically, documents and requirements developed to meet the needs of nuclear power plants have been targeted specifically for the nuclear power industry. Smaller, lower risk facilities often used separate regulatory documents whose scope did not include nuclear power plants. The concern at MNR is that the majority of the comments to REGDOC-2.2.2 were submitted by the nuclear power industry. If the draft document undergoes significant change as a result of the comments submitted without ongoing consideration for all types of nuclear facilities, the result may be a document that meets the needs of the nuclear power industry, but that is unnecessarily burdensome for smaller, lower risk facilities.

Should you have any questions related to the information provided, please do not hesitate to contact me.

Sincerely,



Christopher J. Heysel
Director, Nuclear Operations and Facilities

cjh