



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

September 14, 2017

Dear Mr. Torrie:

#### **Canadian Nuclear Association Comments on REGDOC 2.4.3: Nuclear Criticality Safety**

The Canadian Nuclear Association (CNA) and its members would like to thank the CNSC for the opportunity to comment on REGDOC 2.4.3. Our detailed comments are contained in the attached document; however, the CNA would like to highlight the following issues:

- The merging and copying of content from the previous RD 327 and GD 327 has made it difficult to distinguish between requirements and guidance. In addition, the continual use of “shall” instead of “should” increases the potential for confusion, misinterpretation or errors. The CNA suggests the CNSC make the necessary changes (highlighted in the attachment) to create a clear distinction between requirements and guidance.
- CNA would draw attention to the tables in Section 10. It would appear that requirements taken from the American National Standards Institute (ANSI) have not been copied verbatim into the REGDOC. To avoid confusion and possible errors, the CNA would encourage the CNSC to ensure all elements of ANSI/ANS-8-15 (2014) are fully and correctly copied into the REGDOC including all appropriate tables and footnotes.
- The CNA notes that the draft REGDOC contains management system requirements already documented in CSA N286 and already contained in the license framework. This unnecessary duplication has the potential to lead to confusion and inconsistencies.



- It was not clear to the CNA, which parts of the document would apply to a facility for long-term storage of Canada's used fuel. It would be beneficial to clearly define requirements associated with various phases of the nuclear fuel cycle.

Once again, thank you for the opportunity to comment on the REGDOC. If you have any questions or concerns, please contact me at [couplands@cna.ca](mailto:couplands@cna.ca) or 613-237-4262 ext107.

Sincerely

A handwritten signature in blue ink that reads "Steve Coupland".

Steve Coupland

Director, Regulatory and Environmental Affairs

Canadian Nuclear Association