

May 5, 2014

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MR. BRIAN TORRIE

Director General
Regulatory Policy Directorate

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
K1P 5S9

Dear Mr. Torrie:

Comments on Draft REGDOC-2.10.1 Additional Proposed Requirements

The purpose of this letter is to provide Ontario Power Generation (OPG) comments on the Canadian Nuclear Safety Commission's (CNSC's) proposal to include three additional requirements in REGDOC-2.10.1, "Nuclear Emergency Preparedness and Response".

OPG appreciates the opportunity to provide comment on these additional proposed concerns as the CNSC determines regulatory approach, recognizing that final draft wording is not yet available. As a consultation responder on the initial draft REGDOC-2.10.1, OPG looks forward to receiving the final draft prior to the document being presented to the Commission for approval, in order to more clearly understand the proposed requirements.

CNSC Proposed Concern 1- the pre-distribution of iodine thyroid blocking agents to all residences, businesses and institutions within the plume exposure planning zone (sometimes named the primary zone or the urgent protective action zone, typically sized at approximately 10 km), and selective pre-distribution in the ingestion planning zone (sometimes named secondary zone or extended planning distance, typically sized at approximately 50 to 80 km).

OPG understands the benefits of Potassium Iodide (KI) pill pre-distribution. Other agencies such as the Office of the Fire Marshal and Emergency Management (OFMEM) and Durham Emergency Management Office however are vested with the jurisdiction and responsibility for KI distribution, not OPG. These agencies are working with OPG and other stakeholders, to assess, plan and implement the distribution in a manner that is efficient and safe for the public. OPG will, of course, continue to collaborate with the OFMEM on this issue and meet its KI tablet resourcing obligations as documented in the Provincial Nuclear Emergency Response Plan (PNERP) which is to "procure in advance, adequate stocks of stable iodine tablets for the Primary Zone population", regardless of the decision on how to distribute the KI pills.

CNSC Proposed Concern 2 - the content of emergency information materials and the distribution of such materials in the plume exposure planning zone, as well as ensuring that emergency plan information is available online to all residents within the ingestion planning zone.

OPG has a fulsome public information program, which meets the requirements of the CNSC RD/GD-99.3, in accordance with the Pickering and Darlington Power Reactor Operating Licences. Emergency information aspects of OPG's public information program are also described in the Consolidated Nuclear Emergency Plan (CNEP).

The CNEP additionally defines OPG's commitments under the PNERP which contains requirements for the distribution of emergency information to the public. Pursuant to the PNERP, Annex C, OPG participates in the Public Education Program Subcommittee chaired by the Province's Office of the Fire Marshal and Emergency Management. Through this sub-committee, OPG provides direct support to Durham Region in the development and regular distribution of emergency plan information to the primary zone residents. This information is currently available online and may be linked from any of the participants' websites. OPG in cooperation with our partners, and with input from primary zone residents, will be distributing an additional Public Education document to both the Pickering and Darlington primary zones in May, 2014. This project included holding focus groups with primary zone populations to determine what information the public knows, what information they believe is important, and what format would engage them to read and keep the information.

With respect to putting emergency plan information on line, it is not clear whether this refers to the public information or to specific emergency plans. The Federal, Provincial, Regional and City of Toronto emergency plans are currently available on line. Detailed nuclear utility plans may contain sensitive information and should not be distributed in the public domain.

In terms of regulatory framework OPG believes public information requirements should be directed to RD/GD-99.3, Public Information and Disclosure and not included in REGDOC-2.10.1 in order to reduce regulatory overlap and maintain clear regulatory direction.

CNSC Proposed Concern 3 - the provision of the CNSC and offsite authorities with the technical planning basis for the station's emergency preparedness and response program.

The PNERP provides the foundation for OPG's nuclear emergency plan's offsite response, and site specific design basis accidents are fully detailed in each nuclear generating station's Licensing Basis. OPG requires clarification on additional provisions beyond those presently provided.

If you require further information or have any questions regarding this submission, please contact me at (905) 839-6747 extension 5600.

Sincerely,



Paul Nadeau
Vice President
Security and Emergency Services

cc. M. Santini CNSC (Ottawa)
F. Rinfret CNSC (Ottawa)
C. Moses CNSC (Ottawa)
L. Sigouin CNSC (Ottawa)