

# MNR Comments on CNSC REGDOC-2.2.2 Personnel Training

Applicable Sections	Comment
1. Introduction & 1.2 Scope	Section 1 indicates, "As required by the <i>General Nuclear Safety and Control Regulations</i> , workers shall be trained to carry on the licensed activity. Section 1.2 indicates, "This regulatory document applies to all workers in nuclear facilities who are employed in safety-sensitive occupations and/or safety-sensitive positions. A worker trained to carry on a licensed activity may not be employed in a safety-sensitive position/ occupation and vice versa. The scope does not match the regulations or the NSCA which are used for the basis of authority for this regulatory document.
3. Requirements for a training system for nuclear facilities	The guidance establishes requirements written from the perspective of developing a new training system where no system exists. There is no guidance for gap fitting an established system which may partially meet requirements of this regulatory document.
3. Requirements for a training system for nuclear facilities	Paragraph 5, point 9 indicates, "Licensees shall: ensure continuing training is provided to workers and that it includes update training to programs stemming from the change management process." While update training would obviously be required, continuing training is only required when deemed necessary during the analysis phase of the training program. Modify the sentence to add "as deemed appropriate during task analysis"
4. Record management for a training system & 5. Guidance on the systematic approach to training	Paragraph 1 lists types of documents related to training and indicates that licensees shall, "develop and maintain," the various types of documentation. This is restrictive, considering a facility may use different types of documentation that accomplishes the same functions as the types of documents listed. Additionally, several of the required documentation types are not mentioned in section 5, Guidance on the systematic approach to training. Following the guidance in section 5 should allow the user to meet all requirements of the rest of the REGDOC, not only section 3.0 of the document as stated in the first paragraph of section 5.
4. Record management for a training system & 1.2 Scope	Section 4, paragraph 2 indicates, "Licensees shall also maintain training records on the training and qualifications of all workers." This statement exceeds the scope of the REGDOC which indicates that, "This regulatory document applies to all workers in nuclear facilities who are employed in safety-sensitive occupations and/or safety-sensitive positions."
4. Record management for a training system	Section 4, paragraph 2 indicates, "The training record for each worker, including temporary workers and contractors, shall include all qualifications and certifications held, the expiration dates for time-sensitive qualifications and certifications, and all requalification or recertification requirements." This should be restricted to qualifications and certifications relevant to the work to be performed by the employee. A welding certification is irrelevant if the worker is restricted to carpentry. If the requirement is enforced as written, a facility could be cited for not having an employee's certification to perform marriage ceremonies on file, despite the certification having no relevance to any part of a nuclear facility.
5.4 Implementation phase	The first point of Section 5, paragraph 2 indicates, "It should include: detailed lesson plans (produced by the instructor) based on the training plan and the instructor guides prepared during the development phase." The detailed lesson plan may be fully developed by training staff and not the instructor.
Glossary & 1.3 Relevant legislation	The definitions for safety-sensitive occupation and safety-sensitive position exceeds the provisions of the NSCA and regulations documented in section 1.3 which indicates that, "every licensee shall 'train the workers to carry out the licensed activity in accordance with the Act...'" A gardener's impaired performance while working for a nuclear facility could result in a significant incident affecting health and safety of persons or the environment, yet they are not performing work related to any licensed activity.