

May 20, 2014

NK21-CORR-00531-11323  
NK29-CORR-00531-11728  
NK37-CORR-00531-02237

Mr. B. Torrie  
Director General, Regulatory Policy Directorate  
Canadian Nuclear Safety Commission  
P.O. Box 1046  
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 Bruce Power's 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".

Bruce Power appreciates the opportunity to review and provide comment on these additional proposals, recognizing that final draft wording is not available. After preliminary review of the proposed inclusions, Bruce Power recommends an open workshop to be scheduled with all interested stakeholders to better understand the impacts of what is being proposed and to provide answers to several questions before meaningful comment can be provided.

In support of this request, the initial review of the proposed inclusions has highlighted the following concerns which are provided in Attachment A.

If you require further information or have any questions regarding this submission, please contact Mr. Dan McArthur, Department Manager, Emergency Planning and Programs, at (519) 361-2673, extension 17041.

Yours truly,

A handwritten signature in black ink, appearing to read 'Frank Saunders'.

Frank Saunders  
Vice President Nuclear Oversight and Regulatory Affairs  
Bruce Power

cc: K. Lafrenière, CNSC Ottawa  
CNSC Bruce Site Office (Letter only)

## **Attachment A**

### **Comments on Draft REGDOC-2.10.1 Additional Proposed Requirements**

#### **CNSC Proposed Requirement 1**

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

#### **Bruce Power's Comments**

Bruce Power understands the benefits of Potassium Iodine (KI) pill pre-distribution. Other agencies such as the Office of the Fire Marshall and Emergency Management (OFMEM) and Municipality of Kincardine have jurisdiction and responsibility for KI distribution, whereas Industry does not. These agencies are working with Bruce Power and other stakeholders, to assess, plan and implement the distribution in a manner that is efficient and safe for the public. There also is further concern regarding compliance controls once KI pills have been distributed to recall and lack of option provided to residents as to whether they want to receive KI pills or not. Bruce Power is committed to meeting its current KI pill 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 populations". However, further information is required here to address impacts and questions.

#### **CNSC Proposed Requirement 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.*

#### **Bruce Power's Comments:**

Bruce Power has a robust public information program, in accordance with Bruce A and Bruce B Power Reactor Operating Licences. Emergency information aspects of Bruce Power's public information program are also described in the Nuclear Emergency Response Plan (NERP).

The NERP additionally defines Bruce Power's commitments under the PNERP, which contains requirements for the distribution of emergency information to the public. Pursuant to the PNERP, Annex C, Bruce Power participates in the Public Education Program Subcommittee chaired by the OFMEM. Through this sub-committee, Bruce Power provides direct support to the Municipality of Kincardine in the development and regular distribution of emergency plan information to the Primary Zone residents. This information is currently available online. There is no clear direction outlined in this

additional requirement regarding the method of distribution, whether it is physical or electronic. Bruce Power requires further clarification as to the type and level of detail over and above what is already provided by the PNERP.

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

**CNSC Proposed Requirement 3:**

*The provision of the CNSC and offsite authorities with the technical planning basis for the station's emergency preparedness and response program.*

**Bruce Power's Comments:**

The PNERP provides the foundation for Bruce Power's nuclear emergency plan's offsite response, and site specific design basis accidents are fully detailed in each nuclear generating station's Licensing Basis. Bruce Power requires clarification of this additional provision in order to make complete assessment of the impact.