

**From:** John Froats

**Sent:** Monday, July 14, 2014 9:42 PM

**To:** Consultation

**Subject:** Feedback on the Comments provided with respect to the proposed REGDOC for Construction of Nuclear Power Plants

It appears that most of the feedback provided during the preliminary round of consultation is reflective of some of the comments I submitted with respect to the significant differences between a green field build project and the ongoing modification business that follows through the operating phase of the facility. I continue to believe it is important to separate these two periods in the life cycle and provide focus on the aspects in the green field construction that are key to assurance that the plant that is newly built reflects the as designed plant safety requirements with fidelity.

I also agree with the general feedback that in its' current form, the draft is a mix of requirement, guide, and in some cases practices that are only one way of meeting fundamental requirements. Clarity and focus on requirements in areas important to design assurance ( such as prevention of entry of fraudulent and/or substandard materials, clarity of requirement 'hold points' for regulatory confirmatory inspection, etc.) would, in my view, greatly add to the clarity of the document as a key element of the Regulatory framework for a new build.

Given the significant comment in this area, I would strongly support the Bruce Power suggestion that some form of a stakeholder workshop would be an appropriate next step to discuss scope and content for the document before it goes forward.

Best regards,

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