

APPENDIX 5 – Document Requests

CMD 17-H2 - Submission from CNSC Staff - RECEIVED
CMD 17-H2.1 - NB Power Submission - Commission Hearing – RECEIVED
PowerPoint - Jan 26 – CNSC
PowerPoint - Jan 26 - NB Power
NB Power - Point Lepreau Emergency Response Plan - RECEIVED
Point Lepreau Nuclear Offsite Emergency Plan Volumes I & II – RECEIVED (INFORMATION REQUEST REQUIRED)
E-Doc 4922698 Letter from B. Poulet to B. Plummer, Closure of Fukushima Action (footnote 75 of CNSC Submissions) - RECEIVED
CMD 16-M31 Submission from NB Power on "Intrepid Exercise" - RECEIVED
Letter from S. Granville to B. Poulet, Fukushima Action Item (F AI) 2.1 .1 and 2.1.2 – Seismic Hazards for Point Lepreau, May 11, 2015, e-Doc 4766791 (footnote 73 in CNSC Submissions) - RECEIVED
Letter from S. Granville to B. Poulet, External Hazard Assessments for Point Lepreau, Impact Evaluation and Request for Closure of Fukushima Action Items (FAI) 2.1.1 and 2.1.2, June 30, 2015, e-Doc 4800481 (footnote 74 in CNSC Submissions) - RECEIVED
Surveys and results from neighbouring local towns, presented by NB Power during hearing – RECEIVED (IN PART)
“Navigating for Excellence” report circulated by NB Power (passed around to the members during hearing and confirmed it would be made publicly available) - RECEIVED
Response Arrangements with External Agencies (IR-78600-62) - RECEIVED
ICS - Safety Officer (EP - 78600-I003) - RECEIVED
Preparing the Basis for Emergency Planning (SDP01368-EP01) - RECEIVED
Preparing and Maintaining the Emergency Response (SI-01365-EP01) - RECEIVED
ICS - Information Officer (EP - 78600 - I002) - RECEIVED
Technical Planning Basis – Radiation Emergency (IR-78600-02) - RECEIVED
Documents or explanations based on the statements in NB Power’s CMD:
"Nuclear Oversight has conducted more than 80 internal independent oversight evaluations since 2012" (p 8) Are results or reports available? – DENIED (Internal Use Only)
"External nuclear oversight is provided through the Nuclear Safety Review Board and Corporate Nuclear Oversight Team" (p 9) Are there any reports related to (1) "the effectiveness of the nuclear oversight function including the effectiveness of nuclear oversight

audits by identifying risks to station performance improvement" or (2) risk identification and management? – **DENIED (Internal Use Only)**

"Nuclear Safety Culture Assessment ... is performed every three years" (p 13) Is this Assessment available? – **DENIED (Internal Use Only)**

"NB Power conducted a comprehensive nuclear safety culture assessment in 2014 and 2015" (p 13) Document(s) available? – **DENIED (Internal Use Only)**

"Severe Accident Management Guidelines" (p 34) – **DENIED (Internal Use Only)**

"Annual Compliance Report" (p 57) - **RECEIVED**

"NMM-00660, Nuclear Management Manual" (p 62) - **RECEIVED**

"Point Lepreau Nuclear Generating Station has established and maintains an Emergency Management Program" (p 71) - **RECEIVED**

"RD - 353, Testing the Implementation of Emergency Measures" (p 71/72) - **ONLINE**

"An emergency response plan has been registered and approved by Transport Canada" (p 90) - **RECEIVED**

APPENDIX 6 – Information Request

Tuesday, February 28, 2017

Justice and Public Safety
c/o Faye Morehouse
Argyle Place P.O. Box 6000
Fredericton, NB E3B 5H1

Sent via email

ATTN: RIGHT TO INFORMATION AND PROTECTION OF PRIVACY ACT

Dear Ms. Morehouse:

I am counsel with the Canadian Environmental Law Association (CELA). We are one of the six recipients awarded participant funding by the Canadian Nuclear Safety Commission (the "Commission"). We will be submitting a written intervention and providing an oral address at the Point Lepreau Nuclear Generating Station (NGS) licence renewal hearing on May 10 and 11, 2017.

On February 14, 2017, CELA requested a copy of the province's current Offsite-Emergency Plan for the Point Lepreau NGS. On February 15, 2017, we were informed by Roger Shepard of the New Brunswick Emergency Management Organization (NB EMO) that the document would not be released and we must submit a request for information. On February 16, 2017, we again compelled the NB EMO to provide the off-site emergency plan for the sole purpose of informing our oral and written submissions to the CNSC. No response was received.

As set out in our Participant Funding Program Application, CELA's role before the Commission is to examine the emergency planning provisions relevant to the re-licensing application of the Point Lepreau NGS and secondly, to provide input in respect of their adequacy and opportunities for improvement relevant to the decision on re-licensing the facility. These approved objectives cannot be fulfilled without access to the provincial off-site emergency plan.


Our submission, or Commission Member Document, must be filed with the Commission by March 27, 2017, and it is therefore with urgency that we respectfully request your assistance. CELA requests and seeks access to all volumes of the *Point Lepreau Nuclear Off-Site Emergency Plan* and its planning basis.

We respectfully request that all volumes of the off-site emergency plan and its planning basis be made available to us for the following reasons:

1. The Province of New Brunswick, in its submission to the Commission recognized that “there is a need for more rigor and transparency in off-site emergency arrangements.” CELA has notable expertise in providing guidance to the Commission regarding emergency planning and therefore, the provision of the off-site emergency plan would align with the province’s view on transparency and rigor.
2. In accordance with *Guide – 379: Guide for Applicants and Intervenors Writing CNSC Commission Member Documents*, it is incumbent upon us to present information that allows the Commission to “understand the matter at hand as fully as possible.” We cannot adequately fulfill this onus or the objectives approved in our participant funding application without access to the province’s off-site emergency plan.
3. Offsite emergency response plans are publicly available in Ontario and easily downloadable from the Ministry of Community Safety and Correctional Services website. In light of New Brunswick’s commitment to transparency, we compel you to provide all volumes of the *Point Lepreau Nuclear Off-Site Emergency Plan* for our review.

Our written intervention is due to the Commission on March 27, 2017, and therefore I respectfully request your cooperation and the provision of the off-site plan on or before March 13, 2017. Any questions or response can be directed to kerrie@cela.ca.

Sincerely,



Kerrie Blaise
Counsel
CANADIAN ENVIRONMENTAL LAW ASSOCIATION

Request for Information Form

Instructions

Personal information on this form is collected in accordance with New Brunswick's *Right to Information and Protection of Privacy Act* (RTIPPA). You can access many public body records without making a request under the *Right to Information and Protection of Privacy Act*. Public bodies make a lot of their information available through websites, and printed documents. If you cannot find what you are looking for, contact the [public body's Coordinator](#) to inquire if the information you are seeking is readily available.

ABOUT YOU

In this section of the form, please include:

- your last name, first name and preferred title, if any; the name of the company or organization you are representing, if applicable;
- your complete mailing address and daytime and evening telephone numbers so that the public body can contact you about the request; and
- a fax number or e-mail address, if any, where correspondence may be sent.

ABOUT YOUR REQUEST/INFORMATION YOU WANT TO ACCESS

- Please check **what kind of information** you want to access.
- Indicate the **name of the public body** to which you are making the request
- Indicate whether you would like to **receive a copy** of the record **or examine** the record in person.
- Be as specific as possible in describing the records i.e. time, place and event in order to identify the requested record(s). Feel free to add any additional information that you think may help with processing your request. If you need more space than provided, continue your description on a separate sheet of paper and attach it to the request form.

FEES

- Please note: There are no longer any fees for requests made under the *Right to Information and Protection of Privacy Act*.

ABOUT YOUR PERSONAL INFORMATION

- There is no fee for accessing your own personal information.
- Please be sure to give your full name and any other names that you previously used and any identifying number that relates to the records in question.
- If you are requesting information on behalf of another person, please attach proof that you can legally act for that person. This authorization can be in the form of a signed letter, a Power of Attorney, or other legislated authorization. Please see [section 79](#) for more details.

WHERE TO SEND YOUR REQUEST

- Be sure to sign, date and send your request to the appropriate head of the public body, as defined in Part 1 of RTIPPA. The heads of the public bodies are listed in the [Directory of Public Bodies](#) on the RTIPPA website.



Request for Information Form

ABOUT YOU:

Title	Last name	First name
Ms	Blaise	Kerrie
Name of company or organization (where applicable)		
Canadian Environmental Law Association		
Mailing Address		
55 University Ave, 15th Floor		
City or Town	Province	Postal Code
Toronto	Ontario	M5J 2H7
Home Telephone #	Work Telephone #	
905-506-1512	1-844-755-1420	
Facsimile #	E-mail	
416-960-9392	kerrie@cela.ca	

ABOUT YOUR REQUEST:

- What kind of information do you want to access? Please check one.
 - General information
 - My own personal information
 - Information about another individual (Please attach proof that you can legally act for that person. This authorization can be in the form of a signed letter, a Power of Attorney, or other legislated authorization. Please see section 79 for more details.)
- To which public body are you making your request? (Please fill in the name of the public body; you may consult the [Directory of Public Bodies](#) on the RTIPPA website for contact information.)

Justice and Public Safety - New Brunswick Emergency Management Organization
c/o Faye Morehouse

- Do you want to:
 - receive a hard copy of the record? receive an electronic copy of the record?
 (Please check one) OR examine the record?

ABOUT THE INFORMATION YOU WANT TO ACCESS:

- What record do you want to access? (Please provide as much detail as possible – see instructions)

The Canadian Environmental Law Association seeks access to:

- All volumes of the document titled "Point Lepreau Nuclear Off-Site Emergency Plan" (current version);
- Any documents discussing or outlining the off-site emergency planning basis; and
- Any documents outlining the process or discussing how updates to the off-site emergency plan shall occur.



Request for Information Form

2. What is the time period of the records? *(Please give specific dates. See instructions for details.)*

The Canadian Environmental Law Association is not privy to the date upon which the above noted documents were published and therefore seeks the most recent and in force versions.

YOUR SIGNATURE:

Signature 	Date February 28, 2017
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WHERE TO SEND YOUR REQUEST:

Send your request to the head of the public body that you believe has the information you want.

For contact information, consult the [Directory of Public Bodies](#) on the RT/PPA website.

FOR PUBLIC BODY USE ONLY:	
Date Received	Comments
Request Identification Number	

Option to Print

APPENDIX 7 – Planning Basis Email Correspondence



Kerrie Blaise <kerrie@cela.ca>

Nuclear Offsite Planning Basis - Document Request

Shepard, Roger (JPS/JSP) <Roger.Shepard@gnb.ca>
To: Kerrie Blaise <kerrie@cela.ca>

Mon, Mar 27, 2017 at 10:39 AM

Kerrie,

Point Lepreau classify the radiation Emergency, we follow the notification procedure in accordance with the classification. The province does not have its own planing basis or definition of type of release.

Located in our provincial emergency operations centre is a NB Power representative who speaks to NB EMO and outlines what is happening on site, including type of release.

Cheers

Roger

From: Kerrie Blaise [kerrie@cela.ca]
Sent: Monday, March 27, 2017 11:31 AM
To: Shepard, Roger (JPS/JSP)
Subject: Re: Nuclear Offsite Planning Basis - Document Request

Hi Roger,

Thank you for the clarification and contact, I will reach out to NB Power.

Perhaps you could clarify one more item for me - does the province have its own planning basis or definition of what type of release serves as the basis for the offsite response plan?

Thanks again, appreciated.

Kerrie

On Mon, Mar 27, 2017 at 10:25 AM, Shepard, Roger (JPS/JSP) <Roger.Shepard@gnb.ca<mailto:Roger.Shepard@gnb.ca>> wrote:
Kerrie,

The documentation you are requesting reference "Mass Decontamination" belongs to NB Power.

NB EMO references these documents in our planning with the approval of NB Power.

The mass decontamination documentation is listed below:

Mass Decontamination Planning Basis, version 2, dated 18 September 2012;

Mass Decontamination Concept of Operations, version 5, dated 30 July 2013; and

Mass Decontamination Option Analysis, version 2, dated 30 January 2014.

I CC'd Charles Hickman from NB Power after discussing your request with him.

I hope this helps.

Sincerely

Roger

APPENDIX 8 - NB EMO Website dated April 1, 2017

The screenshot shows the website for the New Brunswick Emergency Measures Organization (EMO). The header includes the GNB Home, Contacts, Français, Departments, Services, and Search options. The main navigation menu is under "Justice and Public Safety", with sub-menus for About Us, Services, Publications, Justice, and Public Safety. The current page is titled "Nuclear Emergency Program".

Navigation: GNB Home | Contacts | Français | Departments | Services | Search

Header: New Brunswick CANADA

Main Menu: Justice and Public Safety

- About Us
- Services
- Publications
- Justice
- Public Safety

Breadcrumbs: Justice and Public Safety > Public Safety > Emergency Measures Organization

Nuclear Emergency Program

The New Brunswick Emergency Measures Organization is the off-site emergency response authority, and administers the Nuclear Emergency Program for the Province of New Brunswick.

Quick Links:

- Radiation Protection
- Potassium Iodide (KI Pills)
- Public Warning System
- 9-1-1
- Public Alerts

Related Links:

- Canadian Nuclear Safety Commission
- NB Power
- Atomic Energy of Canada Ltd.
- Public Safety Canada

Latest:

- New Brunswick Submission to the Canadian Nuclear Safety Commission
- NB Presentation
- Federal Nuclear Emergency Plan
- National Emergency Response System

The bottom of the screenshot shows a Windows taskbar with icons for File Explorer, Google Chrome, Word, Excel, and PowerPoint. The system tray on the right shows the date and time: ENG 7:42 PM, US 2017-04-01.