

Commentary on N286-12, Management system requirements for nuclear facilities



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Contents

Technical Committee on Management Systems	3
CSA N286.0.1 Subcommittee	5
Drafting Task Force	6
Human Performance Task Force	7
Preface	8
0 Introduction	9
0.1 Purpose	9
0.2 Historic perspective of CSA N286	10
1 Context	12
1.1 Purpose of a management system	12
1.2 CSA N286 and its users	14
1.3 CSA N286 and its relation to other codes and standards	15
2 Reference publications	15
3 Key concepts	16
3.1 General	16
3.2 Using the principle approach	16
3.3 Stating the requirement once and avoiding incomplete lists	17
3.4 Reading and using the Standard as a whole	18
3.5 Directed at top management	18
3.6 Determining the requirements	19
3.7 Integration	19
3.8 Using terminology consistently	19
3.8.1 General	19
3.8.2 Worker	20
3.8.3 Top management	20
3.8.4 Business	21
3.8.5 Control	21
3.9 Harmonizing with current standards	21
4 Commentary on requirements of CSA N286	22
4.1 Applicability	22
4.1.1 General	22
4.1.2 Management system principles	23
4.1.3 Graded approach	23
4.2 Safety culture	24
4.3 Business planning	25
4.3.1 General	25
4.3.2 Monitoring and measuring	26
4.4 Organization	27

4.5	Resources	27
4.6	Communication	28
4.7	Information management	28
4.7.1	Documentation of the management system	29
4.8	Work management	29
4.8.1	Work planning/4.8.2 Work control	29
4.8.3	Independent verification of work	30
4.9	Problem identification and resolution	31
4.10	Change	31
4.11	Assessment	32
4.11.1	Self-assessment	32
4.11.2	Independent assessment	32
4.12	Use of experience	33
4.13	Continual improvement	34
4.13.1	General	34
4.13.2	Trend analysis	34
4.13.3	Assessing the effectiveness of the management system	34
4.13.4	Benchmarking	34
5	Commentary on specific requirements	35
5.1	General	35
5.2	Classification criteria [Clause 7.3.6 (c)]	35
5.3	Configuration management (Clause 7.5)	36
5.4	Verification of purchased services (Clause 7.6.7)	36
5.5	Construction (Clause 7.7)	37
5.6	Commissioning (Clause 7.8)	37
5.7	Research and development (Clause 7.11.3)	37
5.8	Counterfeit, fraudulent, and suspect items (CFSI) and other topics that arise through industry experience	38
5.9	Transportation of dangerous goods and other requirements	38

Preface

This is the third edition of CSA N286.0.1, *Commentary on N286-12, Management system requirements for nuclear facilities*. It supersedes the previous editions published in 2014 and 1992. This Commentary is directed only towards the requirements in the 2012 edition of CSA N286. The scope of this edition provides commentary on areas identified by users of CSA N286 which require additional clarity. This Commentary does not provide formal interpretations of CSA N286 and should be viewed only as an informative annotation of portions of CSA N286.

The purpose of this Commentary is to provide background information concerning certain clauses and requirements in CSA N286. This information can help the user clarify the context of the CSA N286 requirements.

This is a completely new edition of the Commentary and was prioritized during a condition assessment and industry scan for areas in need identified by users of CSA N286. It provides a more complete context and explanation on the structure and content of CSA N286, including both the principles and requirements, based on experience collected since the Standard was released.

This Commentary was prepared by the CSA N286.0.1 Subcommittee, with contributions from a Drafting Task Force and Human Performance Task Force, under the jurisdiction of the Technical Committee on Management Systems and the Strategic Steering Committee on Nuclear Standards, and has been formally approved by the Technical Committee.

Notes:

- 1) *Use of the singular does not exclude the plural (and vice versa) when the sense allows.*
- 2) *Although the intended primary application of this Commentary is stated in its scope, it is important to note that it remains the responsibility of the users of the Commentary to judge its suitability for their particular purpose.*
- 3) *This Commentary was developed by consensus, which is defined by CSA Policy governing standardization — Code of good practice for standardization as “substantial agreement. Consensus implies much more than a simple majority, but not necessarily unanimity.” It is consistent with this definition that a member may be included in the Technical Committee list and yet not be in full agreement with all clauses of this Commentary.*
- 4) *This Commentary is subject to review within five years from the date of publication. Suggestions for its improvement will be referred to the appropriate committee. To submit a proposal for change, please send the following information to inquiries@csa-group.org and include “Proposal for change” in the subject line:*
 - a) *commentary designation number;*
 - b) *relevant clause, table, and/or figure number;*
 - c) *wording of the proposed change; and*
 - d) *rationale for the change.*

CSA N286.0.1:21

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0 Introduction

0.1 Purpose

This Commentary was written as an aid for users that undertake implementation of a management system in keeping with the requirements of CSA N286. The Technical Subcommittee recognizes and accommodates the fact that there is a broad range of maturity of the CSA N286 user base ranging from nuclear power plants that have complied with CSA N286 Standards since the first editions of CSA N286 in 1978 to the 2012 edition, to nuclear facilities or nuclear suppliers who have partially complied through license conditions or contractual commitment but have more recently undertaken efforts to meet CSA N286, to new facilities and suppliers who are implementing a CSA N286 management system for the first time.

This Commentary is written to bridge changes in the user community that have occurred since the publication of the 2012 edition of CSA N286. Firstly, there has been a significant change in staffing at long-term existing nuclear facilities and suppliers that traditionally implemented CSA N286. This has resulted in a loss of knowledge (i.e., knowledge retention) as workers leave or retire and are replaced by new workers. Secondly, new and existing facilities and suppliers are currently going through the challenge of implementing a management system aligned with CSA N286.

This Commentary does not provide supplementary requirements or guidance (“shall” or “should”) for the implementation of CSA N286. Rather, it provides commentary on how CSA N286 evolved over time and why the 2012 edition of the Standard is structured the way it is and what it means. As such, the Commentary is not written in the style typical of a standard in that the Commentary is informative and avoids using language such as shall, should, and may that is used in standards to express provisions. The Commentary recognizes that CSA N286 is not a “one size fits all” standard like some other implementation standards. CSA N286 leaves the determination of requirements and implementation detail to the business that is using the Standard. A few points need to be considered when reading this Commentary. These are, but are not limited to, the following:

- This Commentary is for a standard that was written from 2009 to 2011. The Commentary makes no attempt to update CSA N286 to reflect any new thinking or concepts that have arisen since its publication in 2012. Any updating, if required, would be the task of the committee charged with maintaining the Standard.
- Throughout this Commentary, examples are used. These examples are not exhaustive, and for each example provided there are many other examples that could have equally been chosen.
- This Commentary creates no new requirements or recommendations above those in CSA N286. This Commentary discusses the content of the Standard in an informative context using everyday language for added clarity.
- This Commentary does not prescribe methods or techniques of implementation. It provides, in limited cases, examples of implementation to explain the Standard. These examples of implementation, if used, should not be taken as the only way that a requirement is to be met nor is it an endorsement of those particular methods and techniques of implementation.