

1 **UNDERTAKING JX17.9**

2
3 **Undertaking**

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5 To provide the source document that restricts that restricts OPG from providing
6 information regarding Nuclear Security Guards.
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10 **Response**

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12 OPG is not permitted to release security protected prescribed information pursuant to
13 Sections 21 (1) (c) and 23 (1) of the General Nuclear Safety and Control Regulations
14 (“Regulation”) under the *Nuclear Safety and Control Act*.
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16 The Regulation prohibits the release of information relating to nuclear security
17 arrangements, since the release of this information could jeopardize the protection of
18 OPG critical infrastructure, assets, facilities, and systems; or endanger the security of a
19 building. Information relating to security arrangements includes the number of security
20 staff at its nuclear facilities. To OPG’s knowledge, this interpretation is shared by other
21 nuclear operators, such as Bruce Power. OPG believes that security arrangements
22 exclude individual compensation.
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24 Both number of staff and compensation information is required for purposes of
25 benchmarking. As such, OPG was not able to include its nuclear security guard job
26 category as part of the Willis Towers Watson benchmarking study.