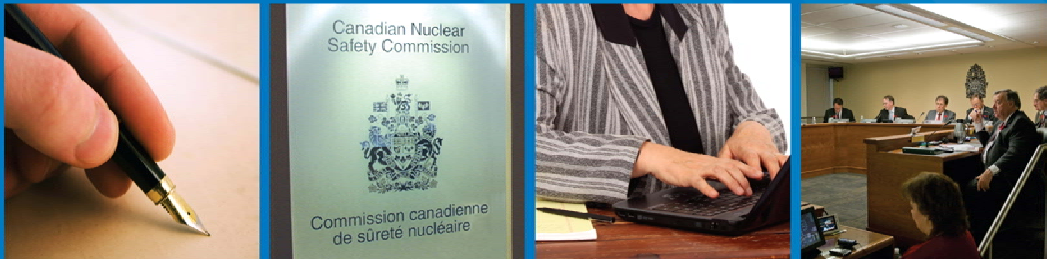# Guide for Applicants and Intervenors Writing CNSC Commission Member Documents

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Guide for Applicants and Intervenors Writing CNSC Commission Member Documents

Également publié en français sous le titre de : Guide à l'intention des demandeurs et des intervenants qui rédigent des documents aux commissaires de la CCSN.

Document availability
This document can be viewed on the CNSC Web site at nuclearsafety.gc.ca
To order a printed copy of the document in English or French, please contact:

Canadian Nuclear Safety Commission
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P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
CANADA

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Email: info@cnsc-ccsn.gc.ca
Web site: nuclearsafety.gc.ca

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1.0 INTRODUCTION

1.1 Purpose

This document provides guidance for writing Commission Member Documents (CMD) for submission to the Canadian Nuclear Safety Commission (CNSC).

Note: *The term "CNSC" refers to the Canadian Nuclear Safety Commission as an organization and to CNSC staff in general. The terms "Commission Tribunal" and "Tribunal" denote the tribunal component of the organization. In some documentation, such as a* Notice of Public Hearing*, the Commission Tribunal may refer to itself as the "Commission". It is the Tribunal that renders decisions in response to CMD submissions.*

1.2 Scope

This document addresses the following aspects of writing an effective CMD:

- A brief overview of the hearing process
- Guiding principles and points to remember
- Writing tips (such as principles of plain language, and the use of visual aids)
- Suggested format and order of information for a licensing decision CMD being prepared by an applicant or intervenor, so that externally submitted CMDs are in the same format as CNSC staff submissions, and
- Preparing and filing a CMD presentation

Due to the complexity of a licensing decision request, this document focuses on preparing a CMD that presents a case about a licensing application that has been made to the Commission Tribunal. Sections 4.0, 5.0, and 6.0 of this document are specific to preparing CMDs related to licensing decisions. Section 7.0 focuses on preparing CMDs for other types of submissions.

The other sections of this document are meant to assist anyone outside the CNSC who is interested in submitting a CMD.

For more information about intervenor submissions, visit
http://www.suretenucleaire.gc.ca/eng/commission/hearings/participate/index.cfm

This document does not include:

- Guidance on preparing licence applications
- Detailed discussion about safety and control areas for particular facilities or groups of facilities, or
- Guidance on presentation techniques

CNSC staff is available to discuss these topics. Contact the CNSC Secretariat at interventions@cnsc-ccsn.gc.ca for information on who can assist you with subject(s) in which you are interested.

1.3   Background

All submissions filed with the CNSC before public hearings are called Commission Member Documents (CMDs). Concise, well-written CMDs help Commission Tribunal members to quickly find the information they need, which leads to a more efficient hearing process. In addition to their immediate usefulness to the Commission Tribunal, CMDs also become part of the record for the hearing (*Canadian Nuclear Safety Commission Rules of Procedur*e, paragraph 15(1)(*c*)).

An internal procedure was developed in 2010 to provide CNSC staff with guidance and tools to present the Tribunal with consistently reliable, well-written CMDs. This procedure, which was based on years of CNSC staff experience and feedback from the Tribunal, included a guide for writing CMDs. Many external stakeholders showed interest in receiving similar guidance, along with a summary of the Commission hearing process.

Development of the current document was further supported by the Tribunal and the CNSC Secretariat, to promote submission of CMD material that would facilitate more effective communication throughout the hearing process—from start to finish.

1.4   Roles and Responsibilities

Applicants are advised to become familiar with the roles and responsibilities associated with Commission Tribunal hearings early on in the process.

Commission Tribunal hearings involved the following parties:

- The Commission Tribunal
- The Secretariat
- CNSC staff
- Applicants and licensees, and
- Intervenors

The responsibilities of these parties are described in sub-sections 1.4.1 through 1.4.5, below, and applicants can write to interventions@cnsc-ccsn.gc.ca for more information.

1.4.1 The Commission Tribunal

In keeping with the requirements of the *Nuclear Safety and Control Act* (NSCA), the Commission Tribunal consists of up to seven permanent members (including the CNSC President), who are appointed by Order in Council. The CNSC President is currently the only full-time member of the Tribunal.

1.4.2 The Secretariat

The Secretariat is made up of CNSC employees who plan Tribunal business and support the President and other Tribunal members as appropriate.

Secretariat functions include:

- Communicating with stakeholders, including government departments, intervenors, licensees, media and the public about Tribunal business
- Receiving licence applications
- Acting as the official registrar for Tribunal documentation, and
- Managing Tribunal hearings and meetings

1.4.3 CNSC Staff

CNSC staff submits CMDs to provide conclusions and recommendations to the Commission Tribunal. They also advise applicants about the kind of information the Commission Tribunal will look for in their CMD submissions.

With respect to the CMD process, CNSC staff functions include (but are not limited to):

- Reviewing licence applications
- Providing review results to applicants
- Advising applicants, and
- Producing CMDs that provide the results of the application review and recommendations

1.4.4 Applicants and Licensees

Applicants and licensees also submit CMDs.

- An "applicant" is a party who has filed a licence application that is under regulatory review.
- A "licensee" is a party who already holds a licence (but who is referred to as an applicant if making an application; for example, for licence amendment[s] or renewal[s]).

In this document, references to an external party usually denote an applicant.

1.4.5 Intervenors

Intervenors are members of the public who have requested the opportunity to present information on the subject of the hearing. The request to act as an intervenor is made by notifying the Secretariat. The *Notice of Public Hearing* contains instructions on how to do this.

Where a hearing allows for both written submissions and an oral presentation, the intervenor may choose to present both orally and in writing, or to make a written submission only. An intervenor may only make an oral presentation if a written submission has been submitted.

Additional information is provided in CNSC INFO-0789, *What You Need to Know to Participate at Public Hearings*.

1.5 Types of Hearings

The Commission Tribunal holds public hearings and abridged hearings to receive and consider the information it needs to make fair, transparent decisions on the licensing of nuclear-related activities. Both approaches are flexible and allow for some format adjustments so that hearings can be as fair, efficient and effective as possible.

1.5.1 Public Hearings

The public hearing is the most common process used and can be held on a single day or over two separate days. This section presents some key information about the public hearing process, and more details are available on the Public Commission Hearings page of the CNSC Web site.

At a public hearing, the applicant usually presents first, followed by CNSC staff and then the intervenor(s).

For any public hearing, a transcript of the proceedings is available on the CNSC Web site the week after the hearing. All proceedings are webcast and archived on the CNSC Web site for three months.

One-day Public Hearings

One-day public hearings generally deal with less complex matters or those of limited public interest. These hearings are held in public and are subject to restrictions on protected information (see subsection 1.5.2, "Closed Sessions").

For a one-day public hearing, the Tribunal hears all of the submissions from the applicant, CNSC staff, and intervenors in a single session, with presentations being followed by questions from Tribunal members.

Two-day Public Hearings

Two-day public hearings deal with more significant licence amendments (such as licence renewals, changes in technology, or removal of a significant licence conditions) or when the level of public interest is high. These hearings are held in public, subject to restrictions on protected information (see subsection 1.5.2, "Closed Sessions").

Two-day public hearings are usually held approximately 60 days apart.

On Day One, the Tribunal hears submissions from the applicant and then from CNSC staff, and then asks questions.

On Day Two, the applicant and CNSC staff presents a brief overview of what was presented on the first day, along with supplementary information that answers questions that Tribunal Members asked on Day One. After the Tribunal members ask a first round of questions of the applicant and CNSC staff, the intervenors are invited to present their submissions. Tribunal members can ask questions after each intervenor's presentation. There is usually a final round of questions after the intervenor presentations and after all written submissions have been considered.

The applicant and CNSC staff is expected to attend on both days, unless otherwise directed by the Tribunal.

1.5.2 Closed Sessions

Certain protected information (such as security information or commercially sensitive material) that may not be discussed in a public forum or otherwise made publicly available is heard *in camera*. This kind of forum is referred to as a "closed session".

1.5.3 Abridged Hearings

Abridged hearings are held for decisions that are more administrative in nature and where it has been determined that there is low public interest in the matter being considered. Environmental assessment (EA) guidelines and, in some cases, EA screening reports, are also considered in abridged hearings (see *Environmental Assessment Screening Process at CNSC* for related details). These hearings are held as closed sessions.

Notification requirements are modified for abridged hearings. The time periods are reduced and public access to the proceedings is limited or absent.

This type of hearing ensures that more administrative matters are dealt with as informally and expeditiously as circumstances and considerations of fairness permit.

1.5.4 Criteria for Choosing Hearing Type

Two-day public hearings are typically conducted for licence applications and renewals, and for non-administrative licence amendments related to Class I facilities, such as nuclear power plants and uranium mines and mills.

The following criteria are used to determine whether a one-day public hearing will suffice:

- The level of public interest is limited or absent

- The matter is not controversial (e.g., amendment adding conditions to an existing licence, requirement for an intermediate decision as part of a sequence of operations, or an application for a decommissioning licence)

- The matter does not introduce or use new or unproven technology

- The matter would not negatively affect the function of safety-related systems

- The issue was previously examined in the context of other licensing proceedings and/or environmental assessments conducted by the Tribunal, or

- The matter is a licence renewal with no substantive amendments, and no (or limited) outstanding issues

The following criteria are taken into account when determining whether a matter may be considered in an abridged hearing:

- The matter is administrative in nature (e.g., name change or document revisions)

- It does not introduce or use new or unproven technology

- The matter is limited to an environmental assessment scoping decision

- The request would not expand the existing facility footprint

- The matter does not affect emissions and effluents

- It does not affect safety or environmental performance requirements

- It would not negatively affect the function of safety-related systems

- The level of public concern is low

- The issue was previously examined in the context of other licensing proceedings and/or environmental assessments conducted by the Tribunal, or

- It is an emergency that involves environmental protection, health, safety, or security, which needs to be addressed promptly and has a low risk profile and low public interest.

After considering the application, CNSC staff makes a recommendation to the Tribunal as to the most appropriate type of hearing; however, the CNSC President makes the final decision.

1.6   Submission Process

For licensing matters, the submission process is as follows:

1. An application is submitted to the Secretariat and copied to appropriate CNSC staff. This submission may include mention of a preferred hearing date (based on the Public Hearings Calendar). In the case of a licence renewal, the applicant identifies the expiry date of the current licence and the Secretariat establishes the timing for the hearing.

2. CNSC staff reviews the application and confirms that the application is complete. If the application is complete, then CNSC staff performs a detailed technical review. If the application is not complete, then the applicant is asked to provide the required information.

3. CNSC staff makes a recommendation to the Secretariat regarding which type of hearing would be most appropriate (i.e., a one-day hearing, a two-day hearing, or an abridged hearing). Staff can also recommend dates to the Secretariat.

4. When the type of hearing and the hearing date are decided, the Secretariat sends a letter to the applicant along with the *Notice of Public Hearing*, indicating the deadlines for filing the CMD and presentation material.

5. The Secretariat assigns a CMD number to the matter, and this number is applied to all documents associated with that matter for the given hearing. The CMD number is provided to the applicant and to CNSC staff as soon as it is assigned. Intervenors are given the CMD number when a decision is made to permit their intervention.

6. When the external submission is received from the applicant:

    a) If the CMD was prepared using one of the CMD templates associated with this guide, then the Secretariat confirms that the assigned CMD number has been applied—if not, then the Secretariat applies the number as appropriate

    b) If a CMD template was not used, then the Secretariat prepares a cover page and applies the assigned CMD number.

1.6.1   Rules of Procedure

The basic requirements associated with CMD submissions are set out in the *Canadian Nuclear Safety Commission Rules of Procedure* (the Rules).

Submissions made by applicants and licensees are subject to paragraphs 18(1) and 18(3) of the Rules, which are as follows:

18(1)   A party who intends to appear at a public hearing shall file with the Commission, at least 30 days before the start of the hearing, a notice that includes:

(*a*) a statement of the party's intention to appear and, where the party will be represented by counsel or an agent, the name, address and telephone and facsimile numbers of the counsel or agent, and

(*b*) a copy of the documentary information and written submission that the party will present to the Commission at the hearing, and a list of any witnesses proposed by the party.

18(3)   Where a public hearing comprises two hearing days, any documentary information and written submission filed under subrule (1) or (2) shall be considered by the Commission on each of those hearing days, and the parties and their witnesses shall attend on each of those hearing days unless the Commission directs otherwise in the interests of a fair, informal and expeditious consideration of the matter.

CNSC staff submissions are subject to paragraphs 2(2) and 18(2), which state that:

2(2)   The Commission or a designated officer, as the case may be, may permit or require officers and employees of the Commission to participate in a proceeding under these Rules in such manner, including presenting information and submissions orally or in writing, questioning participants and responding to questions and submissions, as will enable the Commission or designated officer to determine the matter in a fair, informal and expeditious manner.

18(2)   There shall be filed with the Commission, at least 30 days before the start of a public hearing, a copy of the documentary information and written submission that the officers and employees of the Commission will present to the Commission at the hearing.

Section 19 of the Rules sets out the following stipulations for intervenor submissions:

19(1)   Where a request to intervene at a public hearing is filed with the Commission in accordance with subrules (2) and (3), the Commission, subject to these Rules, may permit the following persons to participate as intervenors at the hearing in the manner and to the extent that the Commission considers will enable it to determine the matter before it in a fair, informal and expeditious manner:

(*a*) a person who has an interest in the matter being heard; or

(*b*) a person who has expertise in the matter or information that may be useful to the Commission in coming to a decision.

19(2)   Where the notice of public hearing given under this Part indicates one hearing day, the request to intervene must be filed with the Commission by the filing date specified in the notice.

19(3)   Where the notice of public hearing given under this Part indicates two hearing days, the request to intervene must be filed with the Commission at least 30 days before the second hearing day.

19(4) The request to intervene shall include:

(a) the name, address and telephone and facsimile numbers of the requester

(b) where the requester intends to be represented by counsel or an agent, the name, address and telephone and facsimile numbers of the counsel or agent

(c) a description of how the requester meets at least one of the conditions for intervening set out in subrule (1) and

(d) a statement setting out whether the requester wishes to intervene by way of written submission only or by way of written submission and oral presentation, and a copy of the information and submission.

19(5) Where a public hearing comprises two hearing days, any written submission and oral presentation of a person permitted to intervene at the public hearing shall be considered by the Commission on the second hearing day.

Please note that the Tribunal may vary or supplement any of the Rules to ensure that a proceeding is dealt with as informally and expeditiously as the circumstances and the considerations of fairness permit (paragraph 3(1) of the Rules).

1.6.2 Submission Timelines

Timeline for One-Day Public Hearings
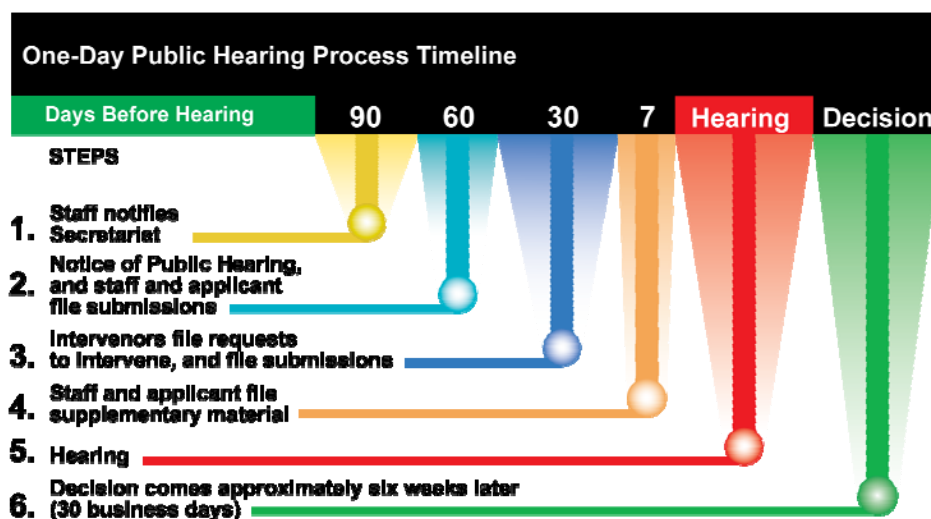
1. If CNSC staff is recommending a one-day public hearing, then staff notifies the Secretariat at least 90 days (ideally 120 days) before the day scheduled for that hearing. This gives the Secretariat the opportunity to advise the applicant of submission deadlines within a reasonable time, and to prepare the *Notice of Public Hearing* within the prescribed timelines.

2. The *Notice of Public Hearing* is issued at least 60 days (ideally 90 days) before the hearing.

3. Submissions from CNSC staff and from the applicant are due 60 days before the hearing.

4. Submissions from intervenors are due 30 days before the hearing.

   Note: The later deadline for intervenor submissions is to allow sufficient time for members of the public to read the material filed by CNSC staff and the applicant before writing their own submissions.

5. Any supplementary material, including slide presentations, must be filed at least seven days before the date on which it will be heard.

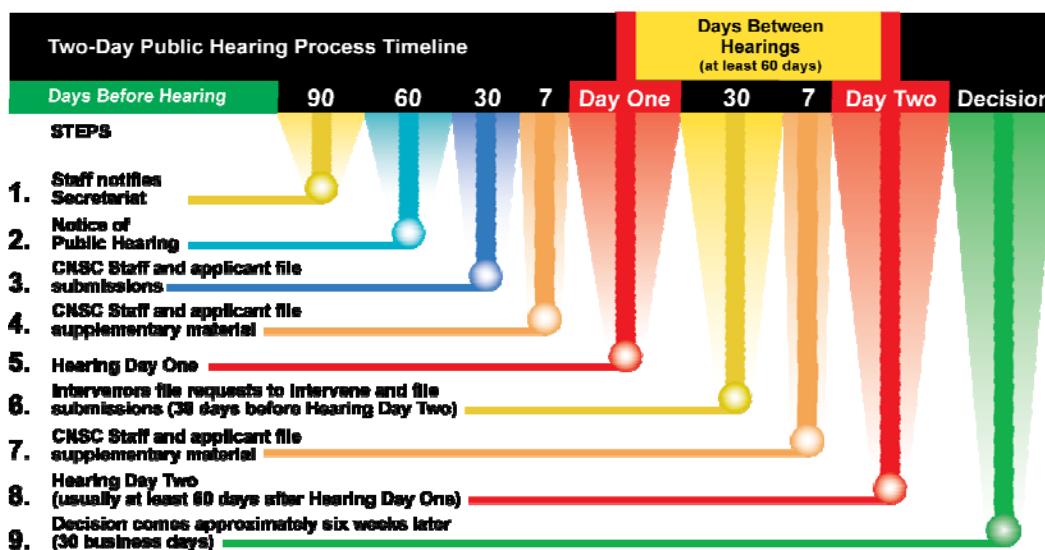6. A decision is announced approximately six weeks (30 business days) after the hearing date.

Timeline for Two-Day Public Hearings

1. If CNSC staff is recommending a two-day public hearing, then it notifies the Secretariat at least 90 days before the day scheduled for Day One.

2. The *Notice of Public Hearing* is issued 60 days before Day One.

3. CNSC staff and the applicant file submissions at least 30 days before Day One.

4. CNSC staff and the applicant file supplementary material, including slide presentations, at least seven days before Day One.

5. CNSC staff and applicant presentations are heard on Day One.

6. Intervenors file requests to intervene, along with related submissions, at least 30 days before the date scheduled for Day Two.

7. Supplementary material that is being filed for consideration on Day Two is expected as early as possible to ensure that CNSC staff, intervenors and the Tribunal have sufficient time to review the material. To enable intervenor review, this means submitting the material **before** the intervenor deadline, which is **30 days prior to** Day Two. This expectation applies to material such as information requested by the Commission Tribunal on Day One, or any substantive updates that have occurred since Day-One. Any other supplementary material, such as PowerPoint presentations, must be filed at least seven days before Day Two.

8. Supplementary staff and applicant submissions, as well as intervenor submissions, are heard on Day Two.

9. A decision is announced approximately six weeks (30 business days) after Day Two.

There are no set deadlines for CMDs submitted for consideration in a closed session. Deadlines for this type of CMD are determined by the Secretariat.

1.6.3 Presentations

The rules pertaining to CMD presentations are addressed in Section 21 of the *Canadian Nuclear Safety Commission Rules of Procedure,* and can be summarized as follows:

1. During a public hearing, the Tribunal may permit each participant to present information and submissions orally or in writing, and may permit participants to question one another and any witnesses (through the Tribunal Chair).

2. The Tribunal may permit participants to respond to any submissions in any manner and sequence that will enable the Tribunal to determine the matter in a fair, informal, and expeditious manner.

3. Any person who makes an oral presentation at a public hearing must have complied with the document filing requirements set out in the appropriate rules.

4. Any person who has made submissions for a public hearing may file supplementary material no later than seven days before the start of that hearing; presentations are considered supplementary material.

Guidance on preparing presentations is provided in Section 8.0, "Presentations."

2.0 TYPES OF CMDS

The type of CMD being prepared depends on the kind of information being presented. Typically, CMDs are prepared to:

- Present the Tribunal with information ("information CMDs"), or
- Ask the Tribunal to render a decision ("decision CMDs")

Depending on the sensitivity of the information being submitted, the CMD is either identified as "unprotected," or clearly marked with the appropriate security classification.

Unprotected CMDs contain information that is appropriate for public viewing. Each unprotected CMD, including the associated presentation material, becomes part of the record for the respective hearing.

Sensitive information should be submitted in a CMD that is clearly marked with the appropriate security classification. This type of CMD is presented in a closed session.

If a small portion of the submission is sensitive (for security or other reasons), but the rest can be made available to the public, then two CMDs should be submitted. In this case, the main CMD is "unprotected," and a second, classified submission contains the secure information.

2.1 Information CMDs

Information CMDs are used to present the Tribunal with such material as:

- Performance reports (such as mid-term reports)

- Detailed event reports, or

- Any other matters of interest

2.2 Decision CMDs

Decision CMDs are used to ask the Tribunal for a decision of any type, from accepting an environmental assessment report to deciding on a policy or licensing matter (such as a licence renewal or amendment, or an approval of actions taken to meet licence conditions).

2.3 Supplemental and Replacement CMDs

CMD submissions are subject to very strict timelines (see sub-section 1.6.2, "Submission Timelines"). However, if one of the following three conditions applies, then the original submission can be supplemented or replaced:

- A previous commitment to provide further information was made on Day One of a two-day hearing

- The Tribunal has requested additional information, or

- There is new and relevant information.

The decision as to whether a supplemental or replacement CMD would be most appropriate is a judgement call on the degree of change to the information.

Tribunal members generally prefer to be able to find and review new or updated information quickly and easily, without spending undue time searching for differences between original and new submissions. Therefore, a supplemental CMD is used to submit changes that are very brief and easily identifiable, and the differences between the original and the new submission are clearly highlighted.

If there are significant or extensive changes to the original submission, then a replacement CMD should be considered.

3.0 GUIDING PRINCIPLES FOR CMD PREPARATION

An effective CMD presents information in a way that allows the Tribunal to understand the matter at hand as fully as possible.

A CMD intended to support a licence application should provide a comprehensive case for licensing. It is usually presented to the Tribunal at a public hearing, where Tribunal members direct the applicant to provide clarification as needed. At the same hearing, Tribunal members consider a parallel CMD prepared by CNSC staff, which details staff conclusions and recommendations about the matter being heard.

3.1 Consultation with the CNSC

When preparing a CMD, applicants and intervenors are advised to consult frequently with appropriate CNSC representatives, and to do so early in the process. This will help ensure that the CMD is prepared properly and that deadlines are met. CNSC points of contact for CMD preparation include the Secretariat and other staff, such as licensing officers and technical specialists.

3.1.1 CNSC Secretariat

All CMDs are to be submitted to the CNSC Secretariat.

As discussed in sub-section 1.4, "Roles and Responsibilities", the Secretariat plans Tribunal business. Its other responsibilities include communicating with stakeholders about Tribunal matters.

The Secretariat should be consulted early in the CMD preparation process for direction on the type of hearing or meeting that would be most appropriate, and to ensure that the *Canadian Nuclear Safety Commission Rules of Procedure* are followed. Early consultation also allows the Secretariat to issue CMD numbers and determine the submission deadlines for CMDs.

The Secretariat can also assist in identifying the appropriate level of detail for the CMD and provide advice on the most effective ways to package new or unusual submissions.

3.1.2 CNSC Staff

Since the Commission hearing process is directly linked to technical review of an application, a CNSC licensing officer is the initial contact point for an applicant preparing a decision CMD.

CNSC licensing officers and technical specialists are also available to assist in identifying which safety and control areas (SCAs) apply to the CMD, and what specific areas CNSC staff will be discuss in their own submission.

In addition, licensing officers can provide information about the status of environmental assessments, expectations for Aboriginal consultation, etc.

3.2   Writing Tips

3.2.1   Remember the Audience

The Tribunal and members of the public are the primary audience for the CMD.

The CMD should contain material that allows the Tribunal to render an informed decision, and that all readers (the Tribunal, the public or others) can be reasonably expected to understand.

It is therefore important to step back regularly when preparing a CMD and to keep the following principles in mind:

- Communicate clearly, logically, and consistently, and

- Convey information in plain language—where you must use specialized, technical language in order to be technically accurate, explain any unusual terms clearly within the text or define them in a glossary

3.2.2   Write with Focus, Clarity, Logic, and Relevance

Focused, clear, logical, and relevant information leads to clear decisions.

The Tribunal relies on the CMD as the primary reference for its decision, so every CMD should:

- Focus on the intended message

- Contain information that is directly related to the hearing or meeting

- Be concise, complete, and clear

- Present information logically and in context to facilitate easy access to the various kinds of information being conveyed, and

- Include any information needed to help the Tribunal to understand what is being presented, and to support its consideration of the matter

When you present a focused, clear, logical and relevant CMD, you are also likely to receive fewer questions from the Tribunal than if documentation is incomplete or unclear, contains irrelevant details, or lacks focus and context.

3.2.3 Use Plain Language

Effective communication relies on plain language. Communicating in plain language means being clear and concise, using short sentences, keeping to the facts, and writing in a way that is easy to read and understand.

While the Tribunal depends on CMDs that are technically and legally sound, it is important to convey information in language that is as plain as possible. However, be sure not to over-simplify material, as this could alter the intended meaning to the extent that context of the message is lost or compromised.

The following suggestions are intended to help you convert complex messages and legal and technical jargon into plain language that is understandable to a wide audience, without compromising the intent or accuracy of the content.

PLAIN LANGUAGE TIPS	
Potential Problem	**Solution**
Run-on sentences	Run-on sentences can usually be split into phrases that are simple and to the point. If a sentence seems too long, focus on the key parts needed to convey the message, and split the sentence into two or more shorter phrases. This will help you sequence your ideas logically and remove unnecessary words that do not add meaning. The goal is to prevent readers from having to go back and re-read content that is difficult to understand before they continue through the document.
Ambiguous phrases	Determine what you are trying to say and change the phrase to make it clear.
Overly wordy or redundant material	Remove words or sentences that only overstate a message or that unnecessarily repeat points that were already made. As long as the message isn't lost, a good rule to keep in mind when expressing complex information is that "less is more". The more simply a message can be communicated, the more impact it has on the reader and the more easily it is understood.
Acronyms and initialisms	An acronym is formed from the first letters of a series of words, and is a pronounceable term that can be used as a word. For example, the acronym for the Canadian Environmental Assessment Agency is "CEAA" (pronounced "seeya"). An initialism is formed in the same way, but the result is not pronounceable as a word. For example, the initialism for the Canadian Nuclear Safety Commission is "CNSC." Acronyms and initialisms that are recognized within an organization or that are familiar to technical specialists may mean nothing to other potential readers. The benefit of using them—to reduce repetition of their often lengthy full forms—is minimized if the reader cannot understand the reference. Spell out each acronym or initialism the first time you use it, and place it in parentheses after the spelled-out name or phrase. For example, "Canadian Nuclear Safety Commission (CNSC)." The initialism can then stand alone in all subsequent occurrences. Do not italicize acronyms and initialisms. If you use several acronyms and initialisms in a document, then define them in a glossary at the end of the main body of the CMD.
Special terminology	Minimize or avoid terminology or jargon that is unfamiliar to the general public. Where possible, replace these words and phrases with simpler, more common terms. Sometimes there is no simple plain-language term to explain a concept, or alternate wording may require an explanation that could complicate, change, or detract from the intended message. If you must use specialized terms in order to be technically or legally accurate, be sure to define them clearly in a glossary at the end of the main document, and then refer readers to the glossary when using the term(s) within the CMD.

Italics and Capitalization

Use the following guidelines for italics and capitalization:

- Apply italics only to the actual titles of acts, regulations and documents or—sparingly—to words that require special *emphasis*, such as direct quotations, and

- Capitalize proper names and publication titles

3.2.4 Provide Balance and Support

It is often difficult to convey highly technical, complex information in a clear message that is readily meaningful to non-experts. Even material written in plain language that is clear to a technical specialist may not be immediately understood by a lay audience or other readers. It is therefore very important to provide enough information that the Tribunal can understand the requested action without unnecessarily complicating that information.

One way to achieve this balance is to ensure that the content of the CMD focuses on the information that is directly relevant to its purpose. You can confirm the relevance of any information by:

- Determining whether it can be supported with data, reports, analysis results, etc., and

- Asking whether it will answer a question that the Tribunal might reasonably be expected to ask

When writing any CMD, a good way to determine the effectiveness of your document is to ask yourself: *"If I were a Tribunal member reading this material, what would I need to know in order to make an informed decision that I could defend with confidence?"*

3.2.5 Provide Context

It is important to put the information in a CMD into context so that all readers can understand the issues easily. For example:

- When drafting content about a highly technical subject, you may be inclined to provide specialized information (such as regulatory limits or scientific formulae) to explain a situation. This kind of material should be discussed broadly in the main body of the CMD, in a way that is meaningful to all readers, with supporting details or more technical information included as in addenda to the main document.

- Instead of only stating that, "…emissions are so many parts per billion (ppb)," expand on this statement with language that is more commonly understood, like, "…the emissions are 20% of the limit."

- When including a unit of measurement, define the unit the first time you use it, and then use that unit consistently throughout the CMD. Consistent units and comparison points are essential to providing context. In most cases, the CNSC uses standard metric units. It is recommended that that applicants consult with CNSC staff on appropriate units of measurement.

3.2.6 Use Visual Aids

When the goal is to present highly technical or complex information clearly and concisely, a picture really is worth a thousand words.

Visual aids such as graphs, photographs, maps, charts, and tables can be very helpful in conveying patterns, trends, site plans, locations, comparisons, etc. Diagrams can be extremely useful for presenting information about such matters as effluent discharge locations, human settlements, ground water and air monitoring stations, or exposure trends (to workers or to the public), etc. Tables, graphs and other visual aids can give the Tribunal valuable views of various areas of interest, such as performance over the licence period, or anticipated milestones for future plans.

When inserting visual aids, provide meaningful labels and make sure they are clear, legible, and relevant to the adjacent content.

3.2.7 Write with One Voice

Plain language is best achieved by writing with one "voice". If your CMD has contributions from multiple authors, carefully review them all and adapt them as necessary to create a document with a single, cohesive style and tone (or "voice").

In addition to making the document easier to read, applying a single voice helps identify and correct gaps, errors, or inconsistencies that can be introduced if input from different writers is just used exactly as received.

3.2.8 Use Active Voice

A document's "voice" or tone influences how content is heard in the reader's mind. In writing, a clear distinction is drawn between passive voice and active voice.

Passive voice usually requires more words, and creates a delay in getting to the point. The following sentence demonstrates the use passive voice:

> *"One of the regulatory tools **used by the CNSC** in carrying out its responsibilities under the Act is **an order**"*.

In this example, the reader has to read the entire sentence to arrive at the subject ("an order"). "…used by the CNSC…" is another use of passive voice that could be rewritten in a more active tone. Changing this sentence to active voice brings the main subject ("an order") to the front and keeps both subjects ("an order" and the "CNSC") and verbs ("is" and "use") close together. As shown below, this "activates" the sentence and makes it easier to read.

> *"**An order** is one of the regulatory tools **that the CNSC uses** to carry out…"*

4.0 OVERVIEW OF THE LICENSING DECISION CMD

The External *CMD Template for Licensing Decisions* provides placeholder headings to ensure that information is presented in the same sequence as that followed by CNSC staff in their licensing decision CMDs (see Section 9.0, "Suggestions for CMD Formatting"). It is recommended that you use the same sequence in your CMD, even if you do not use the template.

LICENSING DECISION CMD—CONTENT CONSIDERATIONS		
Template Section		**Suggested Content Considerations**
Section #	**Section Name**	
	Executive Summary	Provide an executive summary that gives meaningful insight into what is being presented to the Tribunal, including highlights and a general explanation of the intent of the submission, as appropriate. Keep the executive summary to one page if possible, and to a maximum of two pages.
1.0	Introduction	The sub-sections provided in the "Introduction" are intended for explaining the context of the submission, including background information and a summary of the application (see below).
1.1	Background	Provide background information that gives the context of the case for the application. The intent of this sub-section is to promote the Tribunal's thorough understanding of matters such as a description of the facility, the applicant's activities, the site's size, location, and proximity to other facilities, etc. Visual aids such as aerial photographs and maps are extremely helpful here.
1.2	Summary of Application	Explain the history of the application to give the reader a sense of how long the current application process has been going on. Provide information here about such matters as: ▪ The overall purpose of the application ▪ When the application was submitted ▪ What is being requested ▪ Whether the applicant is requesting any high-level changes (changes to the licence period, etc.) ▪ The licensing history
2.0	Business Plan	Use this section to discuss the 'non-safety' factors of the application, including any business considerations or other information that gives context to the licensed activity, the facility, etc. You may want to include an overview of the key elements of the business plan over the requested licence period, discussing, for example: ▪ Factors that may cause a significant increase or decrease in productivity ▪ Potential plans for refurbishment or life extension ▪ Benefits of the proposal or activity described ▪ The expected commercial life of the facility or activity

LICENSING DECISION CMD—CONTENT CONSIDERATIONS		
Template Section		**Suggested Content Considerations**
Section #	**Section Name**	
3.0	Safety and Control Areas	Dedicate this section to information about the safety and control areas (SCAs) associated with the application (see Section 5.0 of this guide). CNSC staff can provide guidance on which SCAs apply to a given application. Working with CNSC staff promotes alignment on specific topics between CNSC staff CMDs and the applicant's CMD.
4.0	Other Matters of Regulatory Interest	"Other matters of regulatory interest" are topics about which the Tribunal may need information, but that do not fall within the SCA framework. Section 6.0 of this guide provides more information about this category and the kind of information the Tribunal expects to see for each topic. CNSC staff can provide guidance on what topics they will be covering in the staff CMD.
	References	If applicable, provide a list of references to any material (published documents, reports, etc.) that are associated with the submission and that might be helpful, or of interest, to the reader. Remember that intervenors or other members of the public may request copies of the documents listed as references in the CMD. If a referenced document is confidential, CNSC staff will ask the applicant for permission before distributing the document.
	Glossary	Define acronyms, initialisms, unavoidable jargon, and special terminology.
	Addenda	As discussed in sub-section 3.2.3 of this guide ("Use Plain Language"), the main body of the CMD should provide relatively high-level information that flows without being interrupted by large or detailed charts, graphs, analytical data, report excerpts, or other minute details. If charts or graphics are small, keep them with the related text in the main body of the document. If they are large, complex, or lengthy, place them in an appropriately named addendum and refer to them from the main body. Add more addenda as appropriate.

5.0 SAFETY AND CONTROL AREAS

To facilitate consistent and comprehensive review and assessment of all regulated facilities and activities, the CNSC has organized its safety and control areas (SCAs) into a comprehensive framework. This framework consists of 14 SCAs grouped into three primary functional areas: management, facility and equipment, and core control processes. See sub-section 5.2 of this guide for SCA definitions.

> *Note: The Tribunal expects any licensing decision CMD to address all 14 SCAs in the following sequence. Therefore, each area should be included, even if only to explain why it is not relevant to the given CMD.*

Performance within each SCA is rated by CNSC staff. Applicants are not expected to rate performance.

To align with the CNSC staff submission, the SCAs should be addressed in Section 3.0 of the CMD.

5.1 Common Elements for SCA Content

In the interest of plain language and to facilitate document flow and readability, use Section 3.0 of the CMD to discuss the SCAs in general, and include extensive supporting details in addenda.

The Commission Tribunal expects any licensing decision CMD to address five common perspectives of each SCA:

1. Relevance and management
2. Past performance
3. Future plans
4. Challenges, and
5. Requests

Subsections 5.1.1 through 5.1.5, below, explain the general expectations associated with these facets of any SCA. Both the general expectations and the SCA-specific recommendations are provided within the *External CMD Template for Licensing Decisions*

5.1.1 Relevance and Management

Submit any information that will help give the Tribunal a complete picture of how the applicant has managed, or will manage, each SCA. Indicate whether the SCA is relevant to the application at hand and describe any measures that have been taken to meet the regulatory requirements associated with it. Explain how the area is controlled and managed, and how the SCA is covered in your suite of programs. Give equal consideration to past performance and future plans.

5.1.2 Past Performance

Provide a high-level explanation of overall performance over the licence period—what is currently happening and how certain areas may factor more than others, etc. Include internal performance indicators and descriptions of improvements made over the period, or any other information that illustrates past performance.

Emphasize plans or activities that may influence future performance.

5.1.3 Future Plans

It is important that the Tribunal understand the expected performance during the proposed licensing period. Describe any performance targets or improvement plans that are intended to influence future performance, and provide any other information that describes plans that are relevant to the SCA.

Include plans for continuous improvement or for self-assessment reports, etc.

5.1.4 Challenges

Identify any challenges associated with the SCA, and explain any actions that have been or will be taken to meet those challenges, including commitments made by CNSC staff.

5.1.5 Requests

Identify any modifications (changes, deletions, etc.) that are being requested with respect to licence conditions associated with the SCA. If no modifications are being requested, then make a clear statement that explains why current arrangements should be retained (such as adherence to a new version of a standard, etc.)

Discuss any related transition requirements.

Provide appropriate details in Addenda to maintain the flow of the document.

5.2 SCA Definitions

The following table identifies the functional areas of the SCA framework, and defines the 14 SCAs associated with those areas.

Communicate directly with CNSC staff to determine how each SCA applies to your specific facility or class of activity, and what kind of information the Tribunal will expect to see for each SCA.

Note: *For more complex facilities, CNSC staff may have identified specific areas within one or more SCAs.*

SAFETY AND CONTROL AREA FRAMEWORK		
FUNCTIONAL AREA	**SAFETY AND CONTROL AREA**	**DEFINITION**
Management	Management system	Covers the framework which establishes the processes and programs required to ensure an organization achieves its safety objectives and continuously monitors its performance against these objectives and fostering a healthy safety culture.
	Human performance management	Covers activities that enable effective human performance through the development and implementation of processes that ensure that licensee staff is sufficient in number in all relevant job areas and have the necessary knowledge, skills, procedures and tools in place to safely carry out their duties.
	Operating performance	This includes an overall review of the conduct of the licensed activities and the activities that enable effective performance.
Facility and equipment	Safety analysis	Maintenance of the safety analysis that supports that overall safety case for the facility. Safety analysis is a systematic evaluation of the potential hazards associated with the conduct of a proposed activity or facility and considers the effectiveness of preventative measures and strategies in reducing the effects of such hazards.
	Physical design	Relates to activities that impact on the ability of systems, components and structures to meet and maintain their design basis given new information arising over time and taking changes in the external environment into account.

SAFETY AND CONTROL AREA FRAMEWORK		
FUNCTIONAL AREA	**SAFETY AND CONTROL AREA**	**DEFINITION**
	Fitness for service	Covers activities that impact on the physical condition of systems, components and structures to ensure that they remain effective over time. This includes programs that ensure all equipment is available to perform its intended design function when called upon to do so.
Core control processes	Radiation protection	Covers the implementation of a radiation protection program in accordance with the RP Regulations. This program must ensure that contamination and radiation doses received are monitored and controlled.
	Conventional health and safety	Covers the implementation of a program to manage workplace safety hazards and to protect personnel and equipment.
	Environmental Protection	Covers programs that identify, control and monitor all releases of radioactive and hazardous substances and effects on the environment from facilities or as the result of licensed activities.
	Emergency Management and fire protection	Covers emergency plans and emergency preparedness programs which exist for emergencies and for non-routine conditions. This also includes any results of exercise participation.
	Waste management	Covers internal waste-related programs which form part of the facility's operations up to the point where the waste is removed from the facility to a separate waste management facility. Also covers the planning for decommissioning.
	Security	Covers the programs required to implement and support the security requirements stipulated in the regulations, in their license, in orders, or in expectations for their facility or activity.
	Safeguards	Covers the programs required for the successful implementation of the obligations arising from the Canada/IAEA Safeguards Agreement.
	Packaging and transport	Programs that cover the safe packaging and transport of nuclear substances and radiation devices to and from the licensed facility.

OTHER MATTERS OF REGULATORY INTEREST
▪ Environmental Assessment
▪ Aboriginal consultation
▪ Other consultation
▪ Cost recovery
▪ Financial guarantees
▪ Other regulatory approvals
▪ Licensee public information program
▪ Nuclear liability insurance

6.0 OTHER MATTERS OF REGULATORY INTEREST

"Other matters of regulatory interest" are topics that are relevant to the decision but that are not covered by the SCAs. These topics should be addressed in section 4.0 of the CMD to align with the CNSC staff submission.

CNSC staff has identified eight "other matters" that most often need to be addressed in external CMD submissions pertaining to licensing decisions. These include, but are not limited to:

- Environmental Assessment

- Aboriginal consultation

- Other consultation

- Cost recovery

- Financial guarantees

- Other regulatory approvals

- Licensee public information program, and

- Nuclear liability insurance

Unlike the SCAs, other matters are addressed only if they are directly relevant to the purpose of the hearing. You should have an early discussion with CNSC staff to determine which of the other matters the CMD should cover.

It is recommended that you address the relevant other matters in the sequence given here. Any additional matters that cannot be mapped to these topics should be included after those included in this list.

The following table explains the kind of information that should be provided for each relevant "other matter".

OTHER MATTERS OF REGULATORY INTEREST — CONTENT CONSIDERATIONS		
Template Section		**Suggested Content Considerations**
Section	**Section Name**	
4.1	Environmental Assessment	Under the *Canadian Environmental Assessment Act* (CEAA), any licensing action by the CNSC has the potential to trigger an environmental assessment (EA). For each application, the CNSC determines whether an EA is required. If an EA is required, then the EA technical studies are normally delegated to the applicant. It is very important to demonstrate that all applicable CEAA requirements delegated to the applicant have been met. The applicant's consultation process around any EAs should also be explained, including the overall history of EAs on the site or at the facility. If an EA has already been done, then identify when and provide a summary of the decision that includes a list of any mitigation measures or follow-up actions that were stipulated in the decision. Explain how these measures have been met, and why any measures have not yet been implemented.
4.2	Aboriginal Consultation	Under section 35 of the *Constitution Act, 1982*, the CNSC has a legal duty as an agent of the Crown to consult with Aboriginal groups when contemplating conduct that may adversely impact potential or established Aboriginal or treaty rights. While applicants and existing licensees do not bear the Crown's legal obligation to consult, their role in engaging Aboriginal groups is important to the efficacy of the Commission Tribunal's decision-making process. The applicant's consultation activities are therefore significant and can inform and assist the consultation activities undertaken by CNSC staff. The outcome of all such activities, including any accommodation measures proposed by the applicant, will also form part of the evidence presented for consideration by the Commission. Therefore, if applicable, it is very important to explain any efforts that have been, are being, or will be taken to engage Aboriginal groups. *Note:* *The CNSC's commitment and ongoing obligation to consult and build relationships with Canada's Aboriginal peoples is explained in the Aboriginal Consultation section of the CNSC Web site* at nuclearsafety.gc.ca.

OTHER MATTERS OF REGULATORY INTEREST — CONTENT CONSIDERATIONS		
Template Section		**Suggested Content Considerations**
Section	**Section Name**	
4.3	Other Consultation	Describe any other consultation that has taken place, or that is taking place, with other governments or other government agencies in relation to the application.
4.4	Cost Recovery	The CNSC recovers the cost of regulating from applicants and licensees through the *Canadian Nuclear Safety Commission Cost Recovery Fees Regulations*. CMDs pertaining to licensing decisions should discuss the current standing of the licensee or facility with regard to cost recovery. If the applicant is making a special request or inquiry about cost recovery, then provide the relevant content here.
4.5	Financial Guarantees	Describe the proposed or existing financial guarantee for decommissioning the licensed activity, including current status and future plans for the financial guarantee. For example, describe the current value and future payment schedule for the related escrow account. The financial guarantee should be based on a cost estimate that is developed from a CNSC-approved approach. The financial guarantee must meet CNSC expectations for liquidity, certainty of value, adequacy of value and continuity, and be a form of financial guarantee that is acceptable to the Tribunal. Refer to CNSC regulatory guides G-206, *Financial Guarantees for the Decommissioning of Licensed Activities*, and G-219, *Decommissioning Planning for Licensed Activities*, for more information.
4.6	Other Regulatory Approvals	Briefly describe any other regulatory approvals or permits (federal, provincial, or municipal) required for the project to proceed or continue. This information should include the status of each approval or permit being sought.
4.7	Public Information Program and Disclosure Program	A public information and disclosure program is a regulatory requirement for licence applicants and licensed operators of Class I nuclear facilities, Class II nuclear facilities, and uranium mines and mills. The documentation pertaining to the proposed public information and disclosure program(s) will therefore have been submitted with the licence application. Provide a summary of the proposed program(s), including a description of the associated documentation. Information about public communication activities undertaken in pre-licensing and previous licensing stages should also be included, along with a description of the proposed public disclosure protocol for communicating information of interest to the public for routine and non-routine situations, events, and activities.
4.8	Nuclear Liability Insurance	Operators of nuclear installations, as defined under the *Nuclear Liability Act*, are required to have nuclear liability insurance. If nuclear liability insurance is relevant to the CMD, then state that you have it and provide applicable details.

OTHER MATTERS OF REGULATORY INTEREST — CONTENT CONSIDERATIONS		
Template Section		**Suggested Content Considerations**
Section	**Section Name**	
4.9	Additional "Other Matters"	If there are any additional matters of regulatory interest that have not been included above, add applicable headings at the end of the standard list of "other matters".

7.0 TIPS FOR OTHER TYPES OF SUBMISSIONS

Any external party may want to submit a CMD for a reason other than a licensing decision. The most common "other types" of CMDs are submitted for one of the following purposes:

- In response to a request from the Tribunal
- To meet a licence condition, or
- To provide an update

Take the following considerations into account when preparing a CMD for something other than a licensing decision.

7.1 Format

The *External CMD Template for Other Submission Types* is available for use on the CNSC Web site.

This template provides a cover sheet, table of contents, and placeholders for an executive summary, an overview section, and glossary and reference pages. It also includes formatting styles that give it the same look and feel as the *External CMD Template for Licensing Decisions*, without the licence-specific placeholders and instructions.

7.2 Executive Summary

If the CMD is extensive, you may want to preface the main body with an executive summary that provides meaningful insight into what is being presented to the Tribunal.

If you don't want an executive summary, then delete the placeholder heading and the related page.

7.3 Overview

The Tribunal will look for an overview that provides background information and highlights, as described below.

7.3.1 Background

In this sub-section, explain why the CMD is being submitted. Also, be sure to demonstrate what you have done and what you are going to do with regard to the matter being heard.

7.3.2 Highlights/Considerations/Key Matters

Highlight any points that you want to immediately draw to the Tribunal's attention. Otherwise, delete the heading and the placeholder for the sub-section.

7.4 Other sections

The balance of the main part of this template provides placeholders that use established template styles for document layout.

Type over any placeholders to create your own content. Any content you create using the Heading styles (Heading 1, Heading 2, or Heading 3) will be included in the Table of Contents when it is updated (see subsection 9.1, item 4, or instructions embedded in the templates).

Delete any placeholder text that you do not need.

7.4.1 Glossary

Use this placeholder page or delete it, as appropriate.

7.4.2 References

Use this placeholder page or delete it, as appropriate.

7.4.3 Addenda

Use this placeholder page to create an addendum, and copy and paste it to create as many addenda as needed. If no addenda are required, then delete this page.

8.0 PRESENTATIONS

It is generally expected that highlights of the CMD will be captured in a slide show for presentation to the Tribunal. Intervenors may also submit presentation material for consideration. The slide shows are typically created using an application such as Microsoft PowerPoint.

Remember that this presentation is the tool that will convey your message not only to the Tribunal, but also to the general public. Therefore, it is important to apply adequate presentation techniques.

8.1 Timing

Unless the Tribunal permits more time, the applicant is typically allocated up to 20 minutes for an oral presentation, followed by a question period.

It is the practice of the Tribunal to allocate 10 minutes for each intervenor's oral presentation, followed by a question period.

8.2 Preparation Tips

The following general parameters should be taken into account when preparing the slide presentation:

- Briefly summarize the CMD, highlighting key points such as notable successes or how challenges have been and will be met
- Present the information in the same sequence as that used in the CMD
- Number each slide for ease of reference in discussion
- Ensure that each slide is legible; for example, ensure that the written information in graphs is not too crowded and is large enough to be read easily, and convey only one idea per graph
- Use legible visual aids wherever possible—well-chosen pictures and graphs can be extremely effective in conveying complex information clearly and quickly
- Include organizational charts and any other diagrams that will assist the Tribunal
- Use consistent font sizes for headings and—where possible—for bulleted lists, ensuring that the font size throughout the presentation can be read on a large screen, and
- Do not overload any one slide—break up extensive content about a particular topic across multiple slides to maintain the presentation's overall legibility and visual effectiveness

8.3   Filing the Presentation

The Secretariat must receive the presentation no less than seven days before the hearing date.

Send an electronic version of the presentation by email to interventions@cnsc-ccsn.gc.ca. If the file is too large to send by email, try converting it to PDF (one slide per page) or send it on a CD-ROM to the following address:

> Office of the Secretariat
> Canadian Nuclear Safety Commission
> 280 Slater Street
> Ottawa, ON, CANADA
> K1P 5S9

Include a list of the presenters (names and titles) and other team members who may be called upon to answer questions.

If speaker notes are prepared, provide three copies to the Tribunal Officer before the start of the hearing (or the day before). The speaker notes are for the interpreters only and are not distributed to the Tribunal Members.

9.0   ASSOCIATED REFERENCES

The following sources provide additional information about CMD preparation and attending and participating at public hearings, along with links to various sections of the CNSC Web site that might provide additional insight.

1. Acts and Regulations

2. Browse Hearing Documents, on the CNSC Web site to view previous CMD submissions; the formatting/layout suggested herein has been followed in staff submissions since May 2010

3. *Canadian Environmental Assessment Act*

4. *Canadian Nuclear Safety Commission Rules of Procedure*

5. CNSC Subscription Centre (to receive notifications whenever the Web site is updated)

6. *Nuclear Safety and Control Act*

7. Public Commission Hearing Participation Request Form

8. Public Hearings Calendar

9. [Watch a Public Commission Hearing or Meeting Online](#)

10. *[What You Need to Know to Attend or Participate at Public Hearings](#)* (INFO-0789)

APPENDIX A - SUGGESTIONS FOR CMD FORMATTING

Two Microsoft Word templates have been prepared to assist with CMD formatting and layout. Both templates include a cover page with placeholder instructions, a *Table of Contents* that can be updated automatically, and placeholder headings to promote inclusion of the kind of information expected by the Tribunal.

The placeholder headings are in place to ensure that information is presented in the same sequence as that used by CNSC staff (since May 2010).

Both templates are designed for two-sided printing.

The *External CMD Template for Licensing Decisions* includes placeholders and instructions that are specific to CMDs being prepared to support licence requests.

The *External CMD Template for Other Submission Types* has the same look and feel as the licensing decisions template, but provides placeholder headings and instructions that apply to other type of submissions.

These templates are available on the CNSC Web site on the Guide for Applicants and Intervenors Writing CNSC Commission Member Documents page.

Using the CMD Templates

Take the following steps to use either template:

1. When you open the template, save the resulting document as appropriate.

2. The cover page includes highlighted instructions that you can just type over. The highlighting should disappear as you type; if this does not happen, just remove the highlighting manually.

3. You should **not** update the *Table of Contents* manually, because it is pre-defined to pick up the heading styles that are already within the document. As you populate the document, these headings will move to different pages, and you may need to introduce new headings or remove placeholders.

4. To update the *Table of Contents* at any time, select the first line in the table and then press **F9**.

5. When asked if you want to replace the existing *Table of Contents*, click **Yes**

6. There is instructional text throughout the template, in grey-shaded blocks of red text. You can delete these blocks as you go, or you can wait until you are finished and delete them as a final step in preparing your CMD.

7. There are also highlighted placeholders throughout the document where you can supply the appropriate content using the predefined styles that were designed to go with the headings. As with the information requests on the cover page, (item 2, above), the highlighting should be removed when you select the text and begin typing. You may have to remove the highlighting manually.

CMD Template Styles

The main styles used in the CMD templates are indicated below. In Microsoft Word 2003, these styles are available in the Microsoft Word *Styles* menu, or in the *Format* menu under "Styles and Formatting".

[BodyText]·for·paragraph·text·in·Executive·Summary,·and·in·Addenda¶
- [Bullet]·for·bullet·list·under·[BodyText]¶
  - [Bullet1]·for·bullet·list·nested·within·a·[Bullet]·list¶

1.0 → [HEADING·1]¶

[BodyText2]·for·paragraph·style·under·[Heading·1].¶
- [Bullet2]·for·bullet·list·under·[BodyText2]¶
  - [Bullet3]·for·bullet·list·nested·within·a·[Bullet2]·list¶

1.1. → [Heading·2]·for·subheadings¶

[BodyText2]·for·paragraph·style·under·[Heading·2].¶

1.1.1 → [Heading·3]·for·lower·subheadings·(these·will·not·appear·in·the·table·of·contents)¶

[BodyText2]·for·paragraph·style·under·[Heading·3].¶

[Figure]·centers·inserted·visual·aids·on·the·page¶

[Caption]·to·identify·the·figure¶