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Canadian Nuclear Safety Commission
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Subject: Comments on RD-338 Draft document

Best Theratronics has reviewed the CNSC's proposed RD/GD-338 draft document, *Security Measures for Sealed Sources*. We believe the document is well laid out and addresses the safety and security concerns surrounding the handling, usage, storage, and transportation of sealed sources.

To facilitate Best Theratronics' business in the USA, Best Theratronics possesses a USNRC Materials license. As part of this license, Best Theratronics is required to follow USNRC security orders. We are pleased that, overall, document RD-338 is consistent with the USNRC security orders.

Although Best Theratronics believes RD-338 to be a well researched and thought-out document, we have several comments that we believe will help to clarify and strengthening the proposed document.

Our comments are attached to this letter.

We thank the CNSC for the opportunity to comment on this draft document.

Sincerely,

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Comments on RD-338 from Best Theratronics

1) Section 2.1
   The definition of “close proximity” should be better defined. It would make sense that sources shipping with the same container, or stored within the same radiation controlled area, should be aggregated to determine the associate risk category. However, what if sources are stored/used in separate radiation controlled areas within the facility? If each area has its own, independent security, then it may not be correct to take the aggregated activity of the facility in determining risk.

2) Section 3.2.3.1
   In this section, the CNSC is requiring the implementation of measures to detected unauthorized access. It then provides a list of means that could be used, such as a process monitoring system and has as an example, daily or twice-weekly audits of the sources. For a facility such as ourselves, we believe daily or even weekly audits would be excessive, given the nature of our inventory and the checks and balances in place. This list is presented as if it is a “guidance” list, rather than a “requirement” list. It would add more clarity to the document if this list was moved to section 3.2.3.2, which provides the guidance to meeting section 3.2.3.1. Related to this is Section 3.3.1. Clarification as what time interval for “regular inventory checking” is appropriate should be given. This time interval should be a guidance value as each licensee is unique.

3) Section 3.2.5.1
   Section 3.2.5.1 discusses physical barriers. Section 3.2.5.1.2 goes on to describe the requirements for an enclosure to be secure. A requirement listed is that all windows providing access to interior areas of concern be equipped with bars, metal grills, or security films. However, we believe that windows fitted with break sensors that detect a window breakage should also be considered as providing adequate security, when all physical barriers are reviewed. For example, Best Theratronics uses three separate physical barriers. The outermost being the exterior wall with windows that are equipped with break sensors that trigger an alarm in the 24 hr security office. Since there are an additional 2 physical barriers, the window break sensor provide sufficient front line security.

4) Section 3.3.5.2
    a. The draft document recommends that prescribed information "not be stored on an open or shared network without proper protection". Clarification should be given as to what the CNSC regards as proper protection. The requirements should also not be too onerous as many organization are moving to network storage. For instance, many of our engineering drawings related to device delays initiatives would be considered sensitive documents. However, it is not feasible to only store these on hard medium or paper format.

    b. Transportation and transmission of prescribed information requires that the top right-hand corner of each page of the document be labeled with the words, **"PRESCRIBED INFORMATION**". For such information entering the United States, the required wording is **"Safeguarded Information**". As such, any prescribed information entering the US from Canada would require both wordings. This becomes tedious to implement. We suggest that the wording, **"Safeguarded Information**" be an acceptable alternative to **"PRESCRIBED INFORMATION**".

5) Section 4.2.1 –
The document lists a requirement that secure containers "shall be equipped with a key, combination padlock or similar locking device that is resistant to an attack using handheld tools". We believe this requirement is excessive in many instances. In particular, all of Best Theratronics' containers are Type B(U) containers used to transport Cat 1 or 2 quantities of Co60 or Cs137. The containers are significant in weight and cannot be opened using standard handheld tools. Also, the weight of the lids and other container components are such that they already provide protection against theft of the sources. Finally, this requirement is for sources in transit. Best Theratronics requires that a driver be within view of the truck at all times. For any shipment over 10 hours, Best Theratronics uses a 2 driver system. This allows for 1 driver to remain with the truck at all times. The addition of a locking device on the container would not provide any additional security. The addition of a locking device would require a modification to all of our transport containers. This would be a significant undertaking.

6) Section 4.3.1 –

This section describes the requirement for a transportation security plan. Best Theratronics is in full agreement for the need for licenses to implement a Transport Security Plan. Best Theratronics has had such a plan since 2008 as required to meet the security orders set out in our USNRC license. This security plan has been reviewed and audited on several occasions by the USNRC. However, RD/GC-338 requires that a transport security plan be developed for each shipment and submitted to the CSNC at least 60 days prior to the anticipated shipment date. The draft document lists the planned route and alternate routes be listed in the submitted transportation security plan. This requirement would not be practical given the number of Category 1 and 2 shipments Best Theratronics makes. This would significantly, and we believe, unnecessarily, increase the workload for both Best Theratronics and the CNSC. As well, the proposed ship date is typically only know approximately 2 weeks before the date. Routes and shipping dates are not finalized until a week or two prior to shipment. It is not possible to submit this information 60 days prior to the expected ship date. Best Theratronics recommends that a general Transport Security Plan be implemented and approved by the CNSC. The information in the Transport Security Plan would be items a. through h. of section 4.3.2. This information would not change from shipment to shipment, and so it makes little sense to continue to submit this to the CNSC for review. Given the number of shipments Best Theratronics undertakes, the CNSC could potentially be reviewing the same information 3 or 4 times a month, on average. The additional information that is unique to each shipment is regarding the planned route (items i. and j. of section 4.3.2). This information can be submitted 48 hours prior to shipment. This would be consistent with the requirements for transportation of Category 1 or 2 sources through the US, as required by individual states.

7) Overall

The document seems to be geared towards users of radiography devices, or other small packages of sealed sources. This seems evident in the sections describing the requirements for secure containers (3.2.5). We believe further considerations should be given to the requirements and guidelines for Cat 1 and 2 quantities of Co60 and Cs137. The types of containers used to store/transport a Cat 1 Co60 source are very different than for a Ir192 source. As such, the requirements to define a container as secure are different. We also wonder how such a security program would look in a hospital with a Co60 teletherapy

unit, which is a Cat 1 source. There seems to be a need for more guidance as to how the requirements set out in RD338 could be applied to such a situation.