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**Written submission from the
Canadian Radiation Protection
Association**

**Mémoire de l'Association canadienne
de radioprotection**

In the Matter of the

À l'égard du

**Regulatory Oversight Report on the Use of
Nuclear Substances in Canada: 2017**

**Rapport de surveillance réglementaire sur
l'utilisation des substances nucléaires au
Canada : 2017**

Commission Meeting

Réunion de la Commission

October 3 and 4, 2018

Les 3 et 4 octobre 2018

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CRPA COMMENTS

Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2017

Submitted by:

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29 AUG 2018





WHO WE ARE

The CRPA strives to ensure the safe use of radiation by providing scientific knowledge, education, expertise and policy guidance for Radiation Protection.

The CRPA was founded in 1979 and currently represents almost three hundred (300) Canadians involved with Radiation Protection.

There are a number of Radiation Protection organizations around, CRPA is a Canadian organization!

For more than ten years we have operated a program for Radiation Safety Professionals to demonstrate their knowledge and commitment to Radiation Protection through the Registered Radiation Safety Professionals Program (credential is CRPA (R)) and involves an initial examination with registration maintenance in three year blocks.

While not all CRPA members are Radiation Safety Officers (RSOs), many are.



COMMENTS

Internal stakeholders polled in preparing our comments included:

- CRPA members of the CRPA-CNSC Working Group that was formed in 2014
- CRPA members of the CNSC-Class II/CRPA/ COMP Working Group established in 2015 that is concerned with Class II activities
- Members of the CRPA Board of Directors.

General Comments

While the number of appendices attached to the 2017 ROR make it very comprehensive, the document is somewhat cumbersome and unwieldy although we have no recommendation as to a more convenient format.

There seems to be several charts where units are missing or incomplete (example Table 1, Figures 19, 50 & 51).

The hyperlinks throughout the report are appreciated. Can consideration be given in future years to linking the CNSC Glossary as well?

There are a number of photographs with CNSC staff throughout the ROR, can they be identified?

We were challenged last year by Commissioner Seeley during the Public Meeting associated with the 2016 ROR with regard type of data collected and emphasis on worker exposures. We asked CRPA members to suggest alternatives and did not get anything meaningful beyond a suggestion to compare activities handled against worker exposures (which we mentioned in regard to the 2016 ROR).

There is some concern among CRPA members about the number of workers who are classified as Nuclear Energy Workers (NEWs) but whose exposure seems to be very low, are these workers being classified as NEWs unnecessarily? We will try to follow this up through the CRPA-CNSC Working Group, perhaps CNSC staff does not see this as a concern.

Section 1.1 - Regulatory oversight

With regard to the fourth paragraph, what is the state of inspecting and regulating out-of-country licensees? How successful has conducting inspections been with this group?

Section 2.2 – Safety Performance measures

The third paragraph regarding open-source licensees speaks about short-lived radionuclides. What about H-3 and C-14 (physical half-lives of 12.3 and 5730 years respectively) used in many research facilities, universities and some basic science laboratories in hospitals?

The fifth paragraph states that performance in the packaging and transport SCA is not explicitly covered – we believe that there are compliance concerns with Class 7 TDG and that this SCA should be explicitly addressed.

Section 3.1 CNSC regulatory effort

The first paragraph states that 944 inspections were completed in 2017. Removing the 160 security inspections, the number of inspections is 784; none of Figures 4,6 and 9 add up to this number. Figure 4 alone shows 865 total inspections. The statistics appear to be confusing.

Section 3.2 – Licensing

The statistics in Table 2 may be better displayed with a pie chart.

Section 3.10 - Stakeholder engagement

CRPA members continue to find CNSC outreach sessions very worthwhile and CNSC presentations and participation at our annual conference priceless.

The *DNSR Newsletter* is another good tool for maintaining stakeholder engagement, and as noted in our comments to the 2016 ROR, increasing publication frequency is desirable.

The article on page 5 of the 2017 Spring DNSR Newsletter on Extremity Exposures was flagged by many RSOs to their NEW workers.

Section 4.4 Radiation safety officers

We are hopeful that the REGDOC that emanates from the RSO Oversight Project will have a positive effect on the performance of medical sector licensees. We are expecting that this project will be extended to the industrial sector as well. The challenges are different but do exist and compliance results are showing this.

Section 5.3 – Operating performance

The specific projects mentioned in the 2nd paragraph do not appear to be described in sections 6.3 and 7.3. What are the projects?

Section 5.7 - Reported events

While the summary of reported events in Appendix C of the ROR is helpful, along with INES classification, Radiation Safety professionals in Canada would find on-line, CNSC-published “NRC-style” event reports to be even more helpful as noted in our comments on the 2016 ROR.

Reports on damaged and malfunctioning radiation devices, transportation incidents, spills and contamination events and security breaches are most useful for RSOs to utilize during worker training sessions.

Section 5.7.2 - Spill or contamination

The dose to the skin of the NEW > 500 mSv due to I-131 contamination was of concern to a number of medical RSOs who discussed the event with their workers (similarly to the Y-90 contamination incident reported in the 2016 ROR).

Section 7.3.3 - Operating performance (Industrial Sector)

We were surprised to see in the fourth paragraph that CNSC staff seems to be relying on inspections to solve non-compliances related to vessel entry instead of proactive outreach to licensees in this sector (maybe that was already attempted with little result). We feel that a confined space entry with nuclear gauges presents the same challenges as any confined space with active source of energies. Being proactive would mean that CNSC could reflect the similarities and encourage better blending of their procedures with generic confined space procedures. A better integration means that workers would apply the procedures more effectively as the understanding would be easier.

COMMENDATIONS

The on-going ability of interested parties to watch Commission Meetings or Commission Hearings via webcast is incredibly helpful to licensee staff, both for gaining an increased appreciation of CNSC expectations as well as in gathering Operating Experience.

We wish to acknowledge our appreciation for CNSC staff involvement with stakeholder engagement generally but specifically for the on-going participation in our annual conference and involvement with CNSC-Industry Working Groups.