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

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

**Regulatory Oversight Report on the  
Use of Nuclear Substances in  
Canada: 2022**

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**Rapport de surveillance réglementaire  
sur l'utilisation des substances  
nucléaires au Canada : 2022**

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Commission Meeting

Réunion de la Commission

November 1-2, 2023

1-2 novembre 2023

**CRPA-CNSC Working Group  
CRPA WG Member Comments**

**Regulatory Oversight Report on the  
Use of Nuclear Substances in Canada: 2022**



Submitted by:

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CRPA Co-Chair  
CRPA-CNSC Working Group  
13 SEP 2023

# COMMENTS

Internal stakeholders polled in preparing our comments included:

- CRPA members of the CRPA-CNSC Working Group that was formed in 2014
  - Trevor Beniston, Stephane Jean-Francois, Julianna Liberatore and Jeff Dovyak

## General Comments

As in the past few years the 2022 ROR has not been explicitly posted on the CNSC website, rather it was located as a Commission Member Document in the 'meeting downloads' section. While proactive Radiation Safety professionals might search out the ROR that applies to their area or areas, it's not given much prominence on the CNSC web-site before it is finalized.

The Regulatory Oversight Reports out to be perused and considered by Radiation Safety Officers (RSOs) in the relevant sectors. How the RSOs should be encouraged is uncertain.

## Use of Nuclear Substances in Canada: 2022

The colors used for various graphs seem to be of a higher contrast this year, it is unfortunate that the colors used to denote various sectors are re-used for other purposes in later graphs (Figure 11 vs Figure 20).

The NDT crawler portrayed on page 19 appears to be an X-Ray tube crawler, **not** an isotopic crawler.

## 3.3 Radiation protection

It is of concerns that there has been a decrease in this Safety and Control Area (SCA). What does CNSC consider to be an acceptable percentage of compliance in a sub-sector?

The continued declining trend in the Radiation Protection SCA for the medical sub-sector continues to be a concern to us and has been flagged to the Canadian Association of Medical Radiation Technologists (CAMRT) again [personal communication to CAMRT Director of Professional Practice 12 SEP].

### **3.5 Conventional health and safety for waste nuclear substance licensees**

Will CNSC staff become more attentive to this SCA for other licensees (i.e. beyond WNSL licensees)? Perhaps a word other than “conventional” should be used – is radiation safety unconventional?

### **5.0 Effective doses to workers**

An explanation for the denial of the dose change request for the 2 Nuclear Medicine clerks ought to be provided. Consideration should be given to referencing the appropriate REGDOC that explains the Dose Change Request procedure.

Thermoluminescent Dosimeters or TLDs are mentioned here – are some licensees still using TLDs?

Last paragraph of this section includes the wording “generally low”. Is there a definition or what’s the value or values? Are there two values, one for Nuclear Energy Workers (NEWs) and one for members of the public? Does it vary sector to sector? Are doses to Canadian workers ever compared to worker doses in other countries?

### **6.0 Reportable events**

The term “MVA” is used in Table 23, we note that the term is defined in the body of the report (page 14). Many agencies are now using the term Motor Vehicle Collision or MVC.

Has the CNSC considered utilizing information from the spring 2023 Transport Survey with regard to the “almost a million packages are shipped each year”? We’ve been hearing that “million” number for decades.

### **6.1 Update on Mississauga Metals & Alloys Inc.**

It seems that the timeline with regard to the order issued by the Inspector does not follow the established timelines.

## **Appendix D – Inspection ratings by sector**

Listing the top non-compliances is useful for teaching but in cases of declining trends additional non-compliances and information is useful.

### **Table 23 Reportable events in 2022**

As previously stated, while the summary of reported events in Table 23 of the ROR is helpful, 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 past RORs). Root cause and summary of corrective actions are missing.

Doses to workers are often not included in the event summary column and when they are there is variety in the magnitude reported (hundreds of mSv (# 5617) to fractions of a uSv (# 5625, why not just say ‘zero’?). Dose reporting should be consistent.

Offhand, there seem to be a lot of incidents involving portable gauges and construction sites.

## **Appendix I - Stakeholder Engagement**

As stated in our comments to the previous RORs, CRPA members continue to find CNSC outreach sessions very worthwhile and CNSC staff presentations and participation, whether in-person or virtual priceless.

## **COMMENDATIONS**

The on-going ability of interested parties to watch Commission Meetings or Commission Hearings via webcast remains 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.