



CMD 24-M17.3

Date: 2024-10-02

File / dossier : 6.02.04

Edocs pdf : 7378417

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

**Mémoire de l'association
canadienne de radioprotection
Projet de transparence nucléaire**

**Regulatory Oversight Report on the
Use of Nuclear Substances in
Canada: 2023**

**Rapport de surveillance réglementaire
sur l'utilisation des substances
nucléaires au Canada : 2023**

Commission Meeting

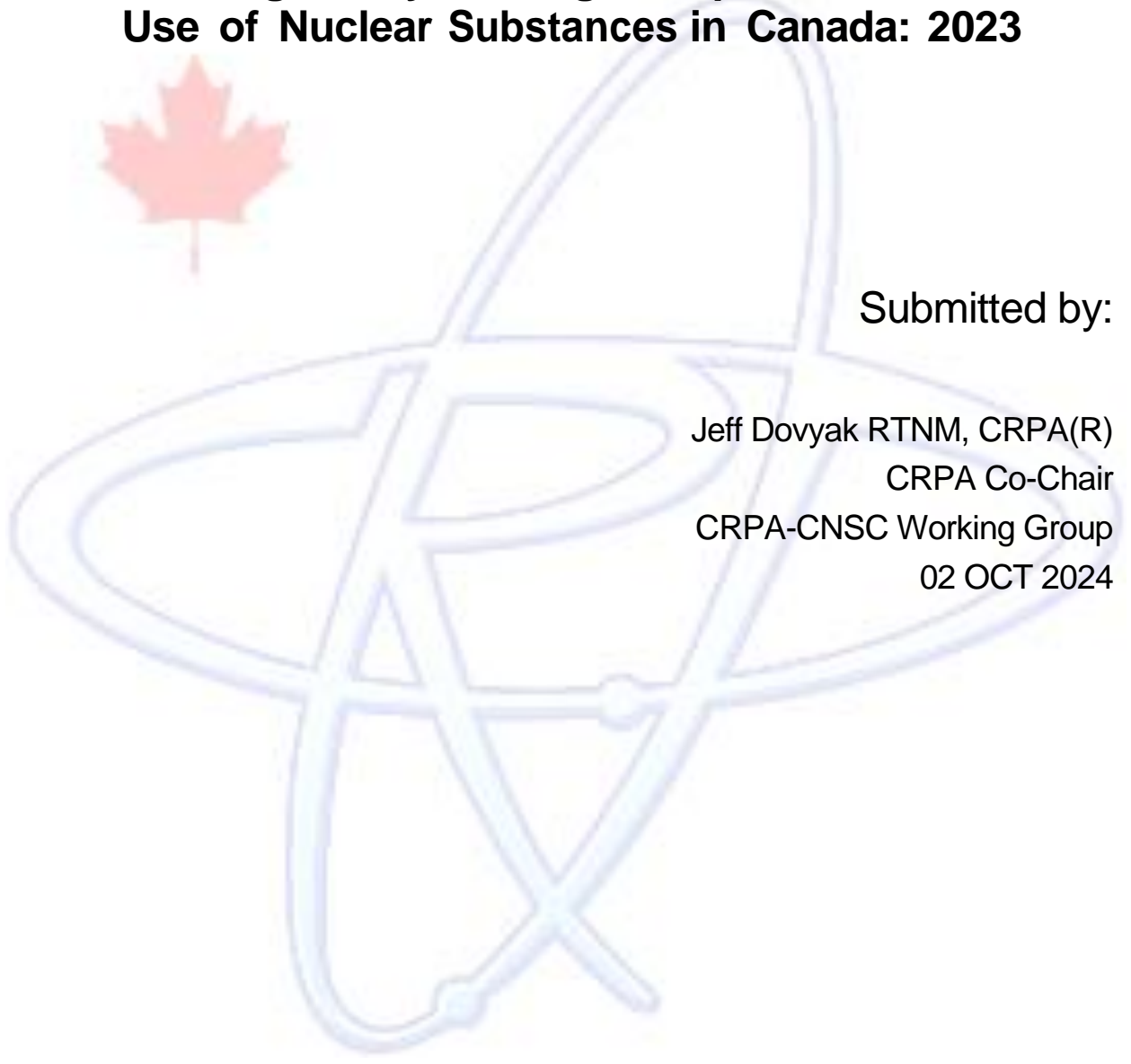
Réunion de la Commission

November 7, 2024

7 novembre 2024

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

**Regulatory Oversight Report on the
Use of Nuclear Substances in Canada: 2023**



Submitted by:

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CRPA Co-Chair
CRPA-CNSC Working Group
02 OCT 2024

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.

Since there some new commissioners we will once again introduce the Canadian Radiation Protection Association (CRPA).

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 almost twenty (20) 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.

Use of Nuclear Substances in Canada: 2024

The detailed information in the Appendices is appreciated but it makes for a long document. On the other hand, perhaps the 'Plain Language' summary is too brief.

5.3 Radiation protection

The **still continuing** declining trend in the Radiation Protection SCA for the medical sub-sector continues to be a significant concern to us. We have previously discussed this with the CAMRT (as has CNSC staff).

CMD-24-M23 is embedded in this RoR, one of the points on Slide 24 of that presentation is "How licensees manage resources for their radiation protection programs has an impact on performance." This ought to be explicitly reiterated in the RoR and embedding that presentation in the RoR is a very good idea.

More dedicated time/resources could be part of the solution. In terms of managing resources by the licensee, what does CNSC mean? Time? Staff? Training?

5.5 Conventional health and safety for waste nuclear substance licensees

We asked last year, not sure we got an answer. Will CNSC staff become more attentive to this SCA for other licensees (i.e. beyond WNSL licensees)?

Drop “conventional”.

7 Effective doses to workers

More detailed exposure breakdowns would be helpful but it is realized that it is RSOs filling in their Annual Compliance Report (ACR) that provides this data, so we do not want to add to the RSOs administrative burden.

8.0 Reportable events

We asked last year, didn't seem to get an answer, 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.

Table 26 Reportable events in 2023

As stated in our submissions on previous RoRs, while the summary of reported events in Table 26 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 a number of past RORs).

Actual amounts of activity vs '> 100 EQ' would be helpful. Perhaps future event reporting could be formatted in a way that would facilitate filling in the Event Summary column (but we are also sensitive to increasing administrative burden for RSOs). Formatting the reports might be a “win-win” for RSOs and the CNSC.

9 - Stakeholder Engagement

As stated in our many 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 still 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 once again acknowledge our appreciation for CNSC staff involvement with stakeholder engagement generally.

