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**From:** Ed Waller <personal information redacted>  
**Sent:** January 23, 2020 2:34 PM  
**To:** Consultation (CNSC/CCSN)  
**Cc:** Fleming, Jeff; Jeff Dovyak; Ali Shoushtarian; Sue Singer  
**Subject:** Comments on REGDOC-1.6.2  
**Attachments:** CRPA comments on RegDoc-1.6.2.docx

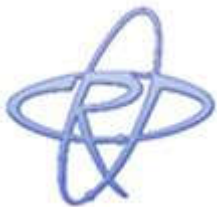
To the attention of the Canadian Nuclear Safety Commission,

Please find attached comments on behalf of the Canadian Radiation Protection Association (CRPA) for Regulatory Document REGDOC-1.6.2 Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences.

We look forward to working with the CNSC on issues related to radiation protection program definition and training education issues related to radiation protection professionals in the future.

With regards,

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President 2019-2020  
Canadian Radiation Protection Association  
Association Canadienne de Radioprotection



Website: <http://www.crpa-acrp.org/home/>

Thank you for the opportunity to comment on this draft RegDoc-1.6.2. As an organization actively representing radiation safety and radiation safety professionals in Canada, including many radiation safety officers, please consider our feedback below.

## **2. Responsibility for Radiation Safety**

Second paragraph: *“RSO is the designation commonly assigned to a radiation safety specialist who administers an RPP on a day-to-day basis.”*

CRPA designates radiation safety professionals to avoid potential confusion. Suggest rewording or more accurately defining “radiation safety specialist”.

In practice, low-risk or industrial licencees may not be sufficiently trained as, or even presume to be, radiation safety practitioners outside of the scope of their licence.

### **3.3 Qualifications**

*“The RSO is encouraged to make use of accreditation programs for RSOs which provide qualifications for the proposed use of nuclear substances and prescribed equipment.”*

Please clarify the difference between accreditation and training. Please recognize that while RSO accreditation is valuable, an appropriate RSO training course should be a minimum requirement.

It is suggested that Canadian organizations that accredit RSOs be listed here, or in an appendix. This includes the Canadian Radiation Protection Association (CRPA) and the Canadian Organization of Medical Physicists (COMP).

Similarly, a link to the *Nuclear Substances and Radiation Devices Service Providers* site could be provided to better steer those unfamiliar to training resources.

### **3.5 Continuing education**

Suggest that active participation or continuing education activities required of professional radiation societies, e.g. CRPA(R), CHP are sufficient for periodic training requirements.

By default, this would not encompass reviewing legislation for updates and this activity is still suggested.