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Sent: January 31, 2020 5:14 PM
To: Consultation (CNSC/CCSN)
Cc: Liam Mooney; Deidre Aldcorn; John Takala; Regulatory Records
Subject: Cameco Corporation's Comments on REGDOC-1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences
Attachments: Cameco's Comments on REGDOC - 1.6.2 Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences.pdf

Sent on behalf of R. Liam Mooney, Vice-President, Safety, Health, Environment, Quality & Regulatory Relations, Cameco Corporation

Dear Mr. Torrie:

Cameco Corporation (Cameco) has prepared the attached comments on *REGDOC-1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences*.

If you have any questions with respect to the above, then please contact John Takala at personal information redacted or [personal information redacted](#).

Kim Hanson

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January 31, 2020

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Dear Mr. Torrie

Cameco Corporation's Comments on REGDOC – 1.6.2, Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences

Cameco Corporation (Cameco) has reviewed and prepared the following comments on the draft REGDOC-1.6.2, *Developing and Implementing an Effective Radiation Protection Program for Nuclear Substances and Radiation Devices Licences* (the REGDOC) for the Canadian Nuclear Safety Commission (CNSC).

Cameco's two major concerns are the introduction of a reporting requirement in section 2 and the improper designation of safety culture as a component of a management system in section 5, both of which are discussed below.

Section 2, Responsibility for Radiation Safety

This section does not accommodate the roles and responsibilities of individuals across the spectrum of licensees and misconstrues how licensees may allocate responsibilities. For example, the phrase "but not accountability" confuses the role of Radiation Safety Officer (RSO) and should be deleted because it is contrary to "acting as a signing authority" in section 3.2. Some licensees may be also able to have a health physicist delegated as an RSO and the section would be improved if this option was recognized.

Section 15 of the *General Nuclear Safety Control Regulations* requires licensees to notify the CNSC of a person who has the authority to act as an RSO. The use of the term "request" on the form referred to could be misinterpreted to mean that a CNSC approval is required in the appointment of an RSO. Cameco recommends that the section be revised to state that the form *can* be used to notify the CNSC of an appointed person.

3.1, Duties of RSOs

As above, section 3.1 is not well suited for all licensees. Larger organizations may have program managers and health physicists who help oversee the radiation protection program in which case it is impractical to require the RSO to report directly to the applicant authority. The first sentence of section 3.1 should be revised to "...authority is accountable, or those who directly supervise the RSO, should ensure..."

For smaller licensees, the reference to an RSO having responsibilities that "are not an adjunct to another job task..." is confusing. What is important is that the RSO has sufficient time and resources to complete the applicable job tasks and these requirements are independent of other tasks an individual may perform. The last sentence in the first paragraph should be revised to "...responsibilities of an RSO are essential to ensure the safe use of nuclear substances..."

The second paragraph should be revised to "[t]he RSO should be given a description of their duties. The ability of the RSO to manage the RPP should be evaluated by management or applicant authority at defined intervals to identify where additional time or other assistance may be needed."

For some licensees, many of the tasks in Appendix A would be delegated to other workers. The first sentence of the third paragraph should be amended to read "[t]he RSO typically ensures the non-exhaustive list of tasks described in Appendix A are performed."

Section 3.2, Authority of the RSO

Cameco does not agree that the RSO must act as a signing authority on all matters of radiation safety and strongly recommends that the second numbered paragraph be deleted or the introductory phrase should be revised to a permissive statement.

Section 3.6.2, Site RSO training

The statement that "[t]he site RSO should have similar levels of experience, training and authority as the corporate RSO" does not apply to all licensees. This statement should be revised to "[t]he site RSO should have experience, training and authority commensurate with the complexity of the RPP and the hazards at their site" to be consistent with a risk-based approach.

Section 4, Development and Implementation of an Effective RPP

This section refers to REGDOCs under development. Cameco appreciates the difficulty for CNSC in drafting related REGDOCs sequentially. However, it is not possible to review a REGDOC when it references unpublished documents. This introduces uncertainty and confusion and can lead to unintended consequences. As in previous submissions, Cameco strongly recommends that this practice be discontinued.

Section 5, Management System and section 5.1, Safety Culture

Cameco's main concern with the REGDOC is the designation of safety culture as a component of a management system in the last paragraph of section 5. Safety culture is an outcome of, and promoted by, a management system and is not a component of a management system. This

mischaracterization confuses the relationship between safety culture and the management system and is inconsistent with REGDOC-2.1.1, *Management System*.

Cameco strongly recommends that 'safety culture' be deleted as a component of the management system. We suggest that section 5.1, Safety Culture, could be moved to precede section 5 as its own section or as a subsection of section 4. In this location it could preface section 5 by stating that activities that promote safety culture should be considered in management system design.

Section 5.2.2, Independent Assessments

Cameco does not agree with the statement that "[i]ndependent assessments should be based on the results of self-assessments". We recommend that "based on" should be revised to "informed by" in the last paragraph.

Section 5.3, Event investigation

The second paragraph requires a detailed event report for systematic events using "recurring action level exceedances" as an example. There is no legislative authority for a collective report to follow event-specific reports and the reporting regulatory documents, such as REGDOC-3.1.2 do not contemplate this type of reporting. The reference to system event reporting should be deleted from the REGDOC.

5.4, Documentation

The third sentence states that the details of the RPP are usually in a radiation safety manual. This sentence should be revised to "[t]he specific details of the RPP are documented to confirm its contents were reviewed and approved". This would ensure that licensees do not require a safety manual and can document their RPP as appropriate for that licensee.

If you have any questions with respect to the above, then please contact John Takala at (306) 956-6486 or john_takala@cameco.com.

Sincerely,



R. Liam Mooney
Vice President
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