

From: Wolf, Alex <awolf@toh.ca>

Sent: July 15, 2019

To: Consultation (CNSC/CCSN) <cncsc.consultation.ccsn@canada.ca>

Subject: Feedback on REGDOC-2.7.2

To whom it may concern,

Thank you for the opportunity to provide comments regarding the publication of REGDOC 2.7.2, Volume I: Ascertaining Occupational Dose.

The Radiation & Laser Safety Department at The Ottawa Hospital wishes to submit the below comments/questions:

- Will the 'Radiological Characterizations' referred to in both the External and Internal dosimetry sections be applied retroactively as a requirement to existing licenses upon renewal?
- Will licensed dosimetry services independently be changing their effective external dose calculations to use compartment factors, or will licensees be required to ensure these changes are made?
- Section 5.5 specifies that, when required, LOE dose can either be measured by Hp(3) dosimeter **near the LOE** or Hp(10)/Hp(0.07) dosimeter **near the eye or on other parts of the body**. Hp(3) dosimeters at the neck-level (e.g. near the eye, but not specifically near the LOE) are common among many existing wearers and would likely produce a good estimation of LOE dose. This section should be edited to clarify whether neck-level Hp(3) dosimeters are suitable measurement tools for at-risk workers exposed to weakly penetrating or non-uniform fields.

Thank you very much and best regards,

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Inspired by research. Driven by compassion. Inspiré par la recherche. Guidé par la compassion.