



## RADIATION SAFETY OFFICE

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Canadian Nuclear Safety Commission  
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Via E-mail

03 JAN2017

Dear Sir/Madame:

**RE: Draft REGDOC-3.1.2 *Reporting Requirements for Non-Power Reactor Class I Facilities and Uranium Mines and Mills***

I was shocked to see the CNSC announcement 20 DEC asking for comments on comments submitted for this draft REGDOC that in JUL was published as being for Class I nuclear facilities excluding power reactors as now being advertised for non-power Class I nuclear facilities **and potentially Class II facilities!**

The title of this draft REGDOC is misleading if not outright deceptive if there is an intention to apply it to Class II facility licensees. Of course many Class II licensees such as hospitals and cancer centres did not comment initially in the summer and fall because the title of the draft REGDOC and verbiage that was published at the time said nothing about potential impact to Class II licensees.

Elements with the CNSC recently seem to be finding ways to add needlessly to licensees administrative burden. What I am getting at here is the requirement in the draft REGDOC for submission of an Annual Compliance Monitoring Report – Class II licensees are already

submitting Annual Compliance Reports and some have been forced to operate RD/GD-99.3 Public Information Programs even though hospitals and cancer treatment centres are clearly exempt from that requirement in RD/GD-99.3. Now there is a possibility that submission of an Annual Compliance Monitoring Report may be added to our reporting burden.

With regard to “comments on comments”, the comments submitted by the six licensees and/or industry associations seem accurate, I fully support AREVA’s recommendation that the Annual Report should be limited to asking about past compliance and not be asking about forward-looking issues as well as the comments from Bruce Power suggesting that as written the Annual Report would almost take the work of doing a licence application – every year as well as contributing nothing to safety or performance.

In summary, Draft REGDOC-3.1.2 **should not** apply to Class II facilities!

4<sup>th</sup> para from 11 JUL news release:

“This draft sets out requirements and guidance for reports and notifications that licensees of Class I nuclear facilities (excluding power reactors) and of uranium mines and mills must submit to the CNSC. This document presents the types of reports, their frequency and the applicable timeframe for reporting.”

2<sup>nd</sup> sentence from CNSC web-site 20 DEC:

“When published, REGDOC-3.1.2 will set out common requirements and guidance for annual compliance and event reporting for all non-power reactor Class I facilities, uranium mines and mills and potentially Class II facilities.”

Sincerely,

*J. Dovyak*

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