

September 27, 2017

Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, Ontario, K1P 5S9

Subject: Nordion Comments on Draft REGDOC 3.2.1, Public Information and Disclosure

Dear Sir or Madam,

The purpose of this letter is to provide Nordion comments on CNSC REGDOC 3.2.1, "Public Information and Disclosure" issued for comments by the CNSC August 16, 2017. We have reviewed the CNSC's proposal and comments are provided in Attachment A.

Nordion's main area of concern is the new requirement to post the full text of the Environmental Risk Assessments (ERA) on the licensee website. Given that the ERAs are highly technical and lengthy, posting in its entirety could lead to undue concern and confusion without explanation or perspective. In addition, Nordion has concerns that the ERA could include sufficient detail of certain infrastructure that could pose a security risk if posted in a public domain. It is recommended to change the requirement to posting a summary of the ERA rather than the report in its entirety as this would help mitigate potential safety concerns and meet the REGDOC's intent to inform the public "using plain, non-technical language".

Should you have any questions or require additional information, please do not hesitate to contact me at (613)592-3400 extension 2730, or email at jackie.kavanagh@nordion.com.

Sincerely,



Jackie Kavanagh
Sr. Manager, Facility Nuclear Compliance

Attachment A

Nordion Comments on Draft CNSC Regulatory Document REGDOC 3.2.1, Public Information and Disclosure

#	Document/ Excerpt of Section	Issue	Suggested Change	Major Comment/ Request for Clarification
1.	2.2.4	<p>Section 2.2.4 indicates that the licensee should ensure that “information is presented in a manner that is understandable to the public, preferably using plain, non-technical language”. Posting an environmental risk assessment (ERA) in its entirety would be contrary to this. The ERA may not be readily understood by the public and could lead to undue concern and confusion. In addition, we have concerns that the ERA could include sufficient detail of certain infrastructure that would pose a security risk to have this information in the public domain.</p>	<p>Change the requirement to posting of <u>a summary</u> of the environmental risk assessment rather than the report in its entirety.</p>	<p>MAJOR</p>