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Canadian Nuclear Association Comments on Stakeholder Workshop Report on Establishing Release Limits

The Canadian Nuclear Association (CNA) has approximately 100 member companies, representing over 60,000 Canadians [1] employed directly, or indirectly, in exploring, mining and processing uranium, generating electricity, and advancing nuclear medicine. The members of the CNA are committed to ensuring safety throughout all aspects of our industry, and protecting the environment.

The CNA has previously provided comments [2, 3] to CNSC staff concerning Discussion Paper DIS-12-02 [4] on the staff's proposals for a process to establish release limits and action levels at nuclear facilities. We appreciate the present opportunity to provide further comments in order to assist the CNSC in developing an effective and appropriate path forward for regulating releases from nuclear facilities.

The CNA and its members consider the Stakeholder Workshop report to be an accurate summary of the discussion. However, we note that it does not provide a discussion of how this information is to be used, or what the next steps in the process will be. The CNA, and its members, recommend that CNSC staff provide details of how it intends to incorporate previous feedback [2, 3] and to consult on any future documents before they become formally developed and issued.

Additionally we wish to reiterate key items that our members believe need to be taken into account if any changes are made to the current framework of limiting releases.

The CNA remains of the view that release limits must be risk based and be supported by scientific evidence to protect human health and the environment. Given that releases from nuclear facilities are already subject to an existing and effective regulatory framework, any release limits set by the CNSC should, to the extent possible, be based on existing federal and provincial regulations. For clarity and ease of understanding, the frameworks for limits for nuclear substances and hazardous substances need to be documented separately. Perhaps in future they could be combined, but not at this stage. We also suggest that limits for nuclear substance releases continue to conform to the internationally established dose limit of 1 mSv/y and that limits for hazardous substance releases align with existing federal and provincial regulation.

Performance of Canadian nuclear facilities demonstrates that the current framework for controlling releases and dose to the public is effective. The use of technology-based criteria to set release limits



lower than already existing regulations, or lower than levels necessary to protect human health or the environment, is unnecessary and therefore unjustified.

The CNA disagrees with the CNSC's concerns relating to the gap between existing release limits and actual effluent levels. In our view, a nuclear facility operating well below regulatory limits correctly informs the public that nuclear facilities are operating safely. Existing risk-based limits ensure the safety of the public, workers and the environment, while the extensive ALARA/pollution prevention programs of our members ensure that all processes are well controlled. If release limits are reduced without a scientific basis for doing so, the burden for reporting will be increased on our members without any real gain in safety.

The CNA is also concerned that statistically-based action levels necessarily regulate variation within day to day operation and will increase reporting requirements and send an incorrect message that current performance under the existing regulatory regime has not been adequately protective of the environment, workers and the public.

However, as we have indicated in the past, the CNA supports having a standard for setting consistent and transparent action levels across the industry, and suggests that this be completed collaboratively through the Canadian Standards Association multi-stakeholder standards development process.

We thank you for your consideration in this matter. If you or your staff require further clarification on any of the above information, please do not hesitate to contact me at 613-237-4262.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Poruks', written over a horizontal dashed line.

Dr. Peter Poruks
Manager of Regulatory Affairs
Canadian Nuclear Association

Cc.

Dr. John Barrett, President, Canadian Nuclear Association
Heather Kleb, M.Sc., Vice President, Canadian Nuclear Association

References

- [1] Canadian Manufacturers and Exporters, 2012, *Nuclear, A Canadian Strategy for Energy, Jobs and Innovation* 2012 September presentation deck.
- [2] H. Kleb, Letter to M. Dallaire, *Re: Feedback on the Comments on Discussion Paper DIS-12-02: Process for Establishing Release Limits and Action Levels at Nuclear Facilities*, 2012 September 21.
- [3] P. Poruks, Letter to M. Dallaire, *Canadian Nuclear Association Participation at June 18 CNSC Workshop on Release Limits*, 2013 July 18.
- [4] Canadian Nuclear Safety Commission, *Process for Establishing Release Limits and Action Levels at Nuclear Facilities*, Discussion Paper DIS-12-02.