CNSC/Industrial Radiography Working Group Meeting October 3, 2013

Mississauga Regional Office (Video/Telephone conference link with Ottawa and Alberta Sites)

Attendees

André Régimbald (CNSC) (Video conference) Peter Fundarek (CNSC) Henry Rabski (CNSC) Tom Levey (Acuren) Patricia McNeil (Atech) (Tele-Conference) Karen Mayer (CNSC) Chris Spencer (Spencer Manufacturing) (Tele-Conference) Doug Hanna (SGS) Lucie Simoneau (CNSC) Dennis Chedraui (QSA) - Guest Ben Powell (QSA) – Guest

Absent

Peter Larkin (CNSC)

Chair of the Meeting Co-Chair

Henry Rabski Alan Brady

1) Review of Minutes from Previous Meeting

P. Fundarek provided editorial comments of the March 2013 minutes. Corrections will be made to the third paragraph of CEDO Project Update.

The Action List produced from the previous meeting was also reviewed. Item 12(WGM) 5.0 will be closed. Representatives from QSA Global were in attendance. Item 12(WGM) 2.0 was discussed. The subject of limiting source strength in Canada was presented at the annual radiography meetings held in May 2013. There was considerable opposition raised at both meetings. A survey was sent out to all licensees and only thirty responses were received. Approximately forty percent indicated some level of support of the idea.

Action: T. Levey agreed to provide a copy of the survey questions, the results of the survey and summary to be attached to the minutes. This item will be closed.

2) Committee Membership

There are currently three vacancies on the working group from the side of industry. R. DeBruyn of Aztec announced at the March 2013 meeting, that he was stepping down. The position remains vacant and it was suggested that the Working Group encourage nominations to fill the vacancy.

Action: An email would be sent to all licensees notifying them of the vacancy and the request for nominations.

C. Spencer announced at the meeting that he was vacating his position on the working group representing the manufacturers of radiography equipment. The members of the Working Group took the opportunity to acknowledge the important contribution that C. Spencer has made over the years and his active participation at the Annual Meetings. The Working Group unanimously voted, and accepted the nomination of Dennis Chedraui from QSA Global as a new member representing the manufacturing sector.

During the discussions, the committee took the opportunity to review the mandate of the Working Group. A vacancy from the CEDO group remains vacant. It was recommended that members of the Working Group sponsor a CEDO to attend the Working Group meetings to provide a perspective from the practionner's point of view. Alternating this invitation amongst industrial representatives on the Committee will provide for CEDOs to participate from across Canada.

The group agreed that clarity for membership needed to be addressed. A representative from the training community would not be considered for membership of the Working Group. They can however be involved through other initiatives such as the CEDO Scheme Committee, participate at the annual meetings or as guests at upcoming Working Group meetings.

Action: Terms of Reference to be updated to clarify membership of the Working Group.

3) Pamphlet for Radiographers - Update

K. Mayer led a discussion on the document prepared by CNSC entitled "Working Safely with Industrial Radiography". A revised version of the document had been distributed prior to the meeting taking into account the comments from Working Group members.

The scope of the document was discussed and clarity was provided by the members. The audience for the document will be CEDOs and the Working Group stressed that the content needs to be at that level general knowledge level.

K. Mayer will take back the comments from the Working Group and prepare a final draft. The draft will be presented in a format that will represent the final layout of the document. The objective is to produce the document in a booklet format similar to the CNSC booklet, "Working Safely with Nuclear Gauges" 2007 and to publish the booklet

prior to the Annual meeting in May 2014.

Action: final draft will be prepared and circulated by December 2013.

4) Scheme Committee Meeting

The Working Group was provided an update on the development of CSA PCP-09. On October 1-2, 2013, the Scheme Committee held meetings in Mississauga at the CSA Offices to review comments received from industry during the public comment period. The CSA received 180 comments regarding the proposed guide. Fifty-six people registered on the CSA website for the purposes of reviewing the document and providing comments. All the comments were reviewed by the Committee and the CSA is now preparing a revised version of the guide that will be submitted to the CNSC for approval sometime in November 2013.

Considerable discussion revolved around the renewal of the certification in particular the number of hours necessary to obtain for renewal. The document proposed 1200 hours of practical experience over the last three years of the five year licensing term. The committee recommended that the guide reduce the number of practical hours to 320 hours. As well, any CEDO that could not meet this requirement could challenge the exam and not have to undergo another apprentiship or perform any additional training prior to challenging the exam. H.Rabski, A. Brady, and T. Levey participated in the scheme committee review.

A. Régimbald asked if the disposition of the comments received, could be published or made available to the public.

Action: H. Rabski to contact CSA to determine if this could be done.

With respect to the Beta test, only 20 CEDOs have taken the test. The goal for CSA is that 100 CEDOs take the test in order to properly evaluate the question bank that will be used to evaluate candidates to CSA PCP-09. A letter was sent out to all radiography licensees to encourage their CEDO to take the Beta test. The evaluation will be ending in mid December at which time CSA will recommend a different strategy for examining new candidates under the new certification regime.

The working group identified the need to inform the training community of the new expectations of certification should CSA PCP-09 be adopted by the CNSC. Potentially, there may be the need to organize a workshop focusing on training expectations with this stakeholder group.

5) New Initiatives 2013 and Beyond

The Working Group over the past years has focused on improving communication between the regulator and industry, while promoting safety and compliance within the radiography industry. The annual meetings have and will continue to be an instrument for continuing these initiatives.

CNSC staff informed the members that the CNSC released a discussion paper last year on the subject of safety culture with the objective of applying the principle across all of the nuclear industry. Comments were received and a REG-DOC is being prepared by the CNSC that will apply to all licensees who possess nuclear substances and devices. A. Régimbald supported the need to promote this principle within the radiography industry and suggested that the Working Group include safety culture in next year's annual meetings and make it the theme for the working group moving forward. Industry Representatives remarked that they are making efforts to incorporate safety culture within their organizations and others spoke of similar initiatives in other industries. A recent conference was held in Calgary where the Oil and Gas Industry discussed the incorporation of safety culture moving forward, the challenges as well as the benefits.

Suggestions were made to continue to work with the manufacturing sector of the Industry on equipment and accessories used in radiography. Sharing information on equipment, reporting malfunctions, and new products entering the marketplace will insure that companies make informed decisions when performing work in the industry.

A proposal was made to invite a representative of the National Energy Board to an upcoming meeting to discuss how they regulate the oil and gas industry. Since a large percentage of the work performed by radiographers is in this sector, there was a consensus that this would be a beneficial exchange for all parties.

- T. Levey reminded the Working Group that an initiative to develop an information pamphlet that radiographers could distribute to clients that explained in layman's terms key aspects of radiography and "what they need to know" is an outstanding item on our previous communications initiatives along with the development of a safety poster for CEDOs. He pointed out that CIRSA has developed a pamphlet previously that could be referenced as part of the initiative.
- D. Chedraui suggested that the Working Group may want to consider scheduling a fall meeting at the QSA Global training facility in Boston, Massachusetts as part of the meeting plans for 2014. This would provide working group members with an opportunity to see the facilities and interact with various members of the QSA team located there.
- P. Fundarek updated the group with respect to CNSC regulatory initiatives. The proposed amendments to the Radiation Protection Regulations are out for public comment. The comment period ends in mid December and radiography licensees should carefully review the proposed amendments to determine the impact if any, on them.

6) Annual Meetings 2014

The group began preliminary discussions with respect to the planning of the 2014 annual meetings. Since the locations have been well established and attendance has been consistant, it was decided that the meetings will take place in Nisku May 7, 2014 and in Ottawa on May 21, 2014. Safety culture will be incorporated in the program as well as updates on the development and implementation of CSA PCP-09. The working group

will finalize the planning of the meetings at the next Working Group meeting tentatively scheduled for February 25, 2014 in Calgary.

7) Other Business

Comments were made that licensees were experiencing difficulty in completing the certification process for new successful CEDO candidates. Personnel Certification Division (PCD) is responsible for the certification process and should be contacted with any concerns brought to the attention of the Director of PCD.

D. Chedraui informed the group that information with respect to incidents involving radiography equipment are currently being reported to the USNRC as per the reporting requirements of both the USNRC and Agreement States. Several examples of such events were identified as part of the discussions. The IAEA also sends out routine notifications of events that involve radiography and are accessible via their website.

The meeting concluded at 4:00 PM.

Radiography Working Group - ACTION LIST			
RWG Item #	Description	Assigned Person(s)	Status or Due Date
	Communications		
12 (WGM) 3.0	Subcommittee to identify information to be published and report to WG at the next meeting Update: Final Draft to be prepared and circulated to WG by Dec 2013	K. Mayer/P. Larkin	Open
13 (WGM) 1.0	Update WG Terms of Reference	H. Rabski	Open
13 (WGM) 2.0	Nomination for New Member	H. Rabski	Open
13 (WGM) 3.0	Posting of Comments wrt CSA PCP-09	H. Rabski	Open
	Compliance		
12(WGM) 2.0	Case for Limiting Source Strength in Radiography CamerasPerform a survey and present findings at a future meeting. Update: T. Levey will prepare a report that includes survey results and recommendations	T. Levey	Closed
12(WGM) 5.0	Invite QSA Representative to future WG Meeting (Equipment Development Discussion)	T. Levey	Closed

CNSC/Industrial Radiography Working Group

TERMS OF REFERENCE

Background

At the December 11, 2008 meeting of the Commission, a proposal from CNSC staff to establish an industry working group was endorsed for the purposes of advancing the regulatory strategy for radiography. During the first meeting of the working group held in May 2009, the following mission statement was developed and supported unanimously.

"The mission of the radiography working group is to collaborate on implementing solutions in order to promote a strong radiation safety culture in the industrial radiography Community while respecting and understanding the interest and expectation of stakeholders."

Guiding Principles

1) Scope of the Working Group

The following objectives provide the overall guidance for the group to fulfill it's mandate which is:

- 1. To improve the radiation safety culture
- 2. To improve Industry-CNSC communication on key issues and deficiencies
- 3. To provide leadership by example-setting precedence
- 4. To initiate change
- 5. To maintain open communication
- 6. To demonstrate cooperation
- 7. To resolve issues and provide output to stakeholders
- 8. To contribute to a safer work environment
- 9. To provide smart input into writing license application guide for industrial radiography and regulatory practices in general-Form of pre-consultation (doing our homework first)

Membership

The radiography working group is comprised of representatives from the Canadian Nuclear Safety Commission (CNSC) and representatives from Industry. CNSC representatives include the Director General of the Directorate of Nuclear Substance Regulation (DNSR) and representative(s) from the Operations Inspection Division, Nuclear Substances and Radiation Devices Division, and Transport Licensing and Strategic Support Division.

Representatives from the Radiography Industry are limited to a maximum of seven persons. The objective is to have persons on the working group from both western and eastern Canada, a representative from the manufacturing sector, and a representative from the operators of radiography devices (CEDO). Membership is restricted to individuals who are in the employment of any Company regulated by the CNSC. Substitution of members is not permitted except for the CEDO representative.

Selection of an Industry Representative is for a term of three years with the possibility of a renewal. Nominations for membership to the radiography working group can be submitted at any time and selection will be made by the committee on an as needed basis.

After missing two consecutive meetings, the co-chair will discuss whether the member remains committed to the working group. The co-chair can recommend that membership be revoked. Decisions regarding membership and revocation must be endorsed by the Director General of the Nuclear Substance Regulation Directorate.

Chairperson and Co-Chair

A chairperson is selected from the CNSC representatives. The role of the chairperson is to prepare the agenda for working group meetings, chair meetings of the working group and to take responsibility for all organizational and communication issues.

A co-chair is selected by the Industry representatives to serve as the primary contact for organization issues and communication purposes. The chairperson can delegate his duties to the co-chair at any time.

The chairperson and co-chair are responsible for inviting any person(s) to participate or observe at meetings of the working group.

Secretary

A representative of the CNSC serves as secretary for the working group. The secretary is responsible for the recording and distribution of the minutes of all meetings, distribution of all documents related to working group meetings, and any communication required to be performed in support of the working group.

Procedures

A quorum of the working group for decision making purposes is defined as three representatives from the CNSC and three representatives from Industry plus one. The committee can hold a meeting even though quorum is not achieved.

Meetings

The working group shall meet a minimum of two times per year. Additional meeting(s) can be held based on consensus of the working group. The preferred method for meetings of the group is face to face but video or teleconferencing is an option to be considered.

Since quorum is necessary for the committee to make decisions, attendance is critical. Baring any unforeseen circumstances, committee members who are unable to attend are to contact the chair or the co-chair, a minimum of three working days before the meeting. Video or teleconferencing is an option for members to participate.

The chairperson is responsible for identifying the time and place of the meetings. All members of the working group are responsible for their personal costs to attend.

The CNSC is responsible for the costs associated with the meeting such as the room rental and any associated hospitality. The cost for lunches or dinners is the responsibility of working group members. Sponsorship of a meeting by Industry representative(s) is at the discretion of the chairperson.

Logistics

The objective is to send the agenda to committee members, two weeks before every meeting. With respect to any documents distribution shall take place at the latest five days before the meeting. The secretary of the working group shall distribute a draft set of minutes no later than two weeks after each meeting. Members have 15 working days to provide comments to the secretary so that the minutes can be prepared for approval at the next meeting. Upon approval, the minutes shall be translated and published by the CNSC and posted on the CIRSA website.

To speak during a meeting, the participant must raise their hand and be acknowledged by the chairman prior to addressing the working group. All members agree to respect the right of all members to address the working group and abide by this principle.

Decisions of the Working Group

All decisions made by the group require consensus. The "fist of five principle" is to be used to reach consensus. Consensus is reached if all members can raise three fingers regarding any decision before the working group.

Review of the Terms of Reference

A minimum of once per year, the committee should review the terms of reference to confirm or make any necessary changes. The "fist of five principle" applies to any changes suggested during the review.

Working Group Expectations

- To agree on having discussions that will result in a win-win situation for both the Industry and the CSNC
- That CNSC becomes more accessible by looking at issues of reducing paperwork without compromising on safety
- That goals and expectations are developed and met
- To identify common goals by the end of the meeting
- Identify priority topics for all involved
- To identify a clear and direct path forward, goals, clear results and identification of action items completed at each of these meetings
- To agree to bring others to meetings to present or explain why something is how it is.
- Identify issues that the working group must address, and schedule those issues. Also, determine when to report conclusions
- To establish a good road map; to improve communication; to acquire better tools for Industry incident awareness, equipment problems and dose statistics
- A positive outcome leading to further collaboration
- CNSC staff and Industry need to clarify what can and cannot be done with respect to policy and regulation changes
- Open lines of communication
- Establish some realistic ground rules to stick to
- Work together, have fun, and develop trust
- Sharing of ideas; compromises
- Open and honest communication
- Set realistic expectations for meeting planning availability of the group- team consideration
- Identify roadblocks so that we can know what is allowed or not allowed upfront-save time form being wasted
- Establish meeting process that includes minutes/record/process and scope
- Receive the agenda 2 weeks prior to every meeting and meeting proceedings