



nordion
SCIENCE ADVANCING HEALTH

May 5, 2017

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

Subject: Nordion Comments on Draft REGDOC 2.13.1 Safeguards and Nuclear Material Accountancy

Nordion (Canada) Inc. has reviewed the Draft REGDOC 2.13.1 Safeguards and Nuclear Material Accountancy and would like to submit the following comments. Please refer to the attached Summary of Nordion Comments on Draft REGDOC 2.13.1.

Sincerely,

Shannon Lacasse
EHS Compliance Specialist
Nordion (Canada), Inc.

cc: M. Young - CNSC
J. Kavanagh – Nordion
R. McGregor – Nordion

Encl.: Summary of Nordion Comments on Draft REGDOC 2.13.1.



Summary of Nordion Comments on Draft REGDOC 2.13.1

Number	Document/Excerpt of Section	Issue	Suggested Change (if applicable)	Major comment/Request for Clarification	Impact, if major comment
1	1.3.1 Legislation and regulations Section 30 of the GNSCR identifies situations in which safeguards reports shall be provided by licensees to the Commission. Regulatory document series 3.1, Reporting Requirements, sets out the CNSC's requirements for event and compliance monitoring reporting by licensees.....	Clarification required.	Suggest referencing the regulatory documents directly: REGDOC 3.1.2, "Reporting Requirements for Non-Power Reactor Class I Nuclear Facilities and Uranium Mines and Mills", etc.	Request for Clarification	n/a
2	2.1.2 Group 1B material – Exemption from safeguards	Information regarding the export of Group 1B material when it temporarily leaves Canada, but does not change ownership is not included in this regulatory document. This is important information to include with regard to transport containers with depleted uranium as shielding.	Please add information regarding the export of Group 1B material when it temporarily leaves Canada, but does not change ownership.	Request for Clarification	n/a



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3	<p>6.1 Inspections Guidance Depending on the size and complexity of the inventory to be verified, IAEA inspections can range in duration from hours to weeks. Notification of an IAEA inspection will typically be sent between 24 hours and a week in advance. The IAEA maintains the right to carry out unannounced inspections at licensees categorized as facilities with a content or annual throughput exceeding five effective kilograms of nuclear material.</p>	<p>There are various types of inspections, some of which do not apply to both categories of licensees. A summary of the types of inspections from both the IAEA and CNSC would provide clarification.</p>	<p>Please add a summary of the different types of inspections including descriptions, applicable licensee category, inspection duration and notification timelines for each type of inspections.</p>	<p>Request for Clarification</p>	n/a
4	<p>6.1 Inspections Guidance In order to reduce IAEA verification activities, the CNSC may request the acceptance of IAEA unannounced inspections by other licensees categorized as facilities, or by licensees categorized as locations outside facilities.</p>	<p>It is unclear from the wording how the acceptance by other licensees of unannounced inspections reduces IAEA verification activities.</p>	<p>Suggest providing further explanation.</p>	<p>Request for Clarification</p>	n/a
5	<p>7.1 Measurement of nuclear material Guidance</p>	<p>Information regarding weight units and rounding as in RD-336 Section 5.2 is not included in this regulatory document.</p>	<p>Assuming information regarding weight units and rounding remains relevant, Nordion suggests adding this information.</p>	<p>Request for Clarification</p>	n/a



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6	7.3 Physical inventory taking A licensee's PIT shall: • confirm the presence of all Group 1 material on the LII	Conducting a physical verification of all Group 1B material may not always be possible as is the case with Group 1B transport containers with depleted uranium as shielding that are part of Nordion's transport container fleet.	Suggest specifying that the requirement for physical confirmation is for Group 1A material.	Major	If the requirement for physical verification is for both Group 1A and 1B material, it is likely that the requirement will not be met.
7	7.3 Physical inventory taking Guidance The CNSC may select a PIT date for the licensee based on availability of CNSC resources.	Although the PIT date has been consistent over the past few years, some flexibility in the selection of the date from both parties would be beneficial in case of changing circumstances such as resources, activities, etc.	Suggest rewording: "The CNSC may select a PIT date for the licensee based on availability of CNSC resources <u>and licensee availability</u> ."	Request for Clarification	n/a
8	7.4 Inventory difference ID shall be reported to the CNSC on the following reports: • the final general ledger of the material balance period (see section 8.1.3)	General ledgers are no longer required for locations outside facilities.	Suggest rewording: • the final general ledger of the material balance period <u>for facilities</u> (see section 8.1.3)	Request for Clarification	n/a



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9	7.4 Inventory difference Licensees shall investigate any instances of a non-zero ID for nuclear material in item form, and shall communicate the results of the investigation to the CNSC and to their own security staff, where such staff exist. Reports on the results of such investigations shall be submitted within 30 days of the PIT, and shall include the licensees' conclusions as to the source of ID and any correcting measures.	It is unclear who the contact is for submission of the investigation report and how the report shall be submitted.	Suggest indicating who the contact is for submission of the investigation report and details on the process for submission.	Request for Clarification	n/a
13	8.1.2 Inventory change document For all shipments of nuclear material, the shipper shall provide a copy of the ICD to the receiver.	The requirement for the shipper to submit acknowledgement of receipt from the foreign receiver to the CNSC when exported nuclear material will not be subject to IAEA safeguards in the recipient country as in RD-336 Section 5.1.2 is not included in this regulatory document.	Is this submission no longer a requirement?	Request for Clarification	n/a



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14	8.1.2 Inventory change document Correcting or deleting an inventory change document A correcting ICD shall be dated with the current date, not the date on which the original transaction occurred. The correcting ICD will be identical to the original, save for the date.....	Clarification required.	Suggest specifying which Label shall have the current date. Suggest rewording: "A correcting ICD shall be dated with the current date in Label 412, not the date on which the original transaction occurred. The correcting ICD will be identical to the original, save for the date..."	Request for Clarification	n/a
15	8.1.3 General ledger For months in which no transactions occur, licensees are not required to submit general ledgers to the CNSC.	Clarification required.	Suggest rewording: For months in which no transactions occur, licensees <u>categorized as facilities</u> are not required to submit general ledgers to the CNSC.	Request for Clarification	n/a
16	8.1.6 Reconciliation statement A reconciliation statement is a report that calculates ID (see section 7.4); that is, the difference between the book ending inventory, derived from the most recent general ledger, and the physical ending inventory, derived from the P-KMPIS or LI.	Clarification required.	Suggest rewording: A reconciliation statement is a report that calculates ID (see section 7.4); that is, the difference between the book ending inventory, derived from the most recent general ledger <u>(for licensees categorized as facilities) or the ICDS (for licensees categorized as LOFs)</u> , and the physical ending inventory, derived from the P-KMPIS or LI.	Request for Clarification	n/a



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17	8.1.7 Obligated material inventory summary	Clarification required.	Suggest indicating that OMIS reports are not required for years in which there is no inventory of foreign-obligated materials in the licensee's possession.	Request for Clarification	n/a